

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

ICON ENTERTAINMENT)	
GROUP, ET AL.,)	
)	
Plaintiffs,)	
)	
vs.)	Civil Action No.
)	2:20-cv-00101
STEVEN G. ROSSER, ET)	
AL.,)	
)	
Defendants.)	

DEPOSITION

of JOSEPH VAILLANCOURT

Taken at the offices of
CRABBE BROWN & JAMES, LLP
500 South Front Street, Suite 1200
Columbus, Ohio 43215
on November 13, 2020, at 2:29 p.m.

Reported by: Carmen G. Maley

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<p>1 APPEARANCES:</p> <p>2 Barton R. Keyes</p> <p>3 COOPER & ELLIOTT, LLC</p> <p>4 2175 Riverside Drive</p> <p>5 Columbus, Ohio 43221</p> <p>6 bartk@cooperelliott.com</p> <p>7 614.482.4089</p> <p>8</p> <p>9 David A. Goldstein</p> <p>10 DAVID A. GOLDSTEIN CO., L.P.A.</p> <p>11 511 South High Street</p> <p>12 Suite 200</p> <p>13 Columbus, Ohio 43215</p> <p>14 614.222.1889</p> <p>15 dgoldstein@dgoldsteinlaw.com</p> <p>16</p> <p>17 on behalf of the Plaintiffs.</p> <p>18</p> <p>19 Larry H. James</p> <p>20 Natalie P. Bryans</p> <p>21 Christopher R. Green</p> <p>22 CRABBE, BROWN & JAMES, LLP</p> <p>23 500 South Front Street</p> <p>24 Suite 1200</p> <p>Columbus, Ohio 43215</p> <p>614.229.4567</p> <p>ljames@cbjlawyers.com</p> <p>nbryans@cbjlawyers.com</p> <p>cgreen@cbjlawyers.com</p> <p>on behalf of the Defendants,</p> <p>Rosser and Lancaster.</p> <p>Andria C. Noble</p> <p>Westley M. Phillips</p> <p>Columbus City Attorneys</p> <p>77 North Front Street, 4th Floor</p> <p>Columbus, Ohio 43215</p> <p>614.645.6964</p> <p>acnoble@columbus.gov</p> <p>wmphillips@columbus.gov</p> <p>on behalf of the Defendant,</p> <p>City of Columbus.</p>	<p>Page 2</p> <p>1 STIPULATIONS</p> <p>2 It is stipulated by and among counsel</p> <p>3 for the respective parties that the deposition</p> <p>4 of JOSEPH VAILLANCOURT, a Witness herein, called</p> <p>5 by the Defendants under the applicable Rules of</p> <p>6 Federal Civil Court Procedure, may be taken at</p> <p>7 this time by the stenographic court reporter and</p> <p>8 notary public pursuant to notice and by</p> <p>9 agreement; that said deposition may be reduced</p> <p>10 to writing stenographically by the court</p> <p>11 reporter, whose notes thereafter may be</p> <p>12 transcribed outside the presence of the witness;</p> <p>13 and that the proof of the official character and</p> <p>14 qualification of the notary is waived; that the</p> <p>15 reading and signature of the said witness to the</p> <p>16 transcript of the deposition are expressly</p> <p>17 waived by counsel and the witness; said</p> <p>18 deposition to have the same force and effect as</p> <p>19 though signed by the said witness.</p> <p>20 --0--</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p>Page 3</p> <p>1</p> <p>2 ALSO PRESENT:</p> <p>3 Joe Sullo</p> <p>4</p> <p>5 Ania Puzio-Stimmell</p> <p>6</p> <p>7 --0--</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>Page 5</p> <p>1 INDEX OF EXAMINATION</p> <p>2 PAGE</p> <p>3 BY MR. GREEN: 6</p> <p>4 BY MS. NOBLE: 69</p> <p>5 BY MR. GOLDSTEIN: 97</p> <p>6 BY MR. GREEN: 108</p> <p>7 BY MS. NOBLE: 117</p> <p>8</p> <p>9 INDEX OF EXHIBITS</p> <p>10 EXHIBIT DESCRIPTION PAGE</p> <p>11 1 Binder of Documents 15</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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<p>Page 6</p> <p>1 JOSEPH VAILLANCOURT</p> <p>2 being first duly sworn, as hereinafter</p> <p>3 certified, deposes and says as follows:</p> <p>4 EXAMINATION</p> <p>5 BY MR. GREEN:</p> <p>6 Q. Good afternoon, Mr. Vaillancourt. My</p> <p>7 name is Chris Green. I represent Officers</p> <p>8 Rosser and Lancaster. I'm going to ask you a</p> <p>9 few questions this afternoon. The best thing</p> <p>10 you can do for me is wait for me to finish my</p> <p>11 question, and I will wait for you to finish your</p> <p>12 answer. That way, we're not interrupting each</p> <p>13 other. Does that sound fair?</p> <p>14 A. Yes.</p> <p>15 Q. The other part is do the best,</p> <p>16 especially since you have the mask on, to give</p> <p>17 me good yes or no answers, and try not to do any</p> <p>18 uh-huhs or huh-uhs. Does that sound fair?</p> <p>19 A. Yes.</p> <p>20 Q. You were subpoenaed here today to</p> <p>21 testify in the Icon v. Rosser, et al. case. Is</p> <p>22 that your understanding?</p> <p>23 A. Yes.</p> <p>24 Q. Can you state your full name and spell</p>	<p>Page 8</p> <p>1 College.</p> <p>2 Q. Do you have a degree in anything?</p> <p>3 A. No, I do not.</p> <p>4 Q. What about any military service?</p> <p>5 A. I was in the Marine Corps.</p> <p>6 Q. What period of time were you in the</p> <p>7 Marine Corps?</p> <p>8 A. 1969 through 1971.</p> <p>9 Q. Under what circumstances did you leave</p> <p>10 the military?</p> <p>11 A. I was retired for disability. I was</p> <p>12 injured.</p> <p>13 Q. What sort of work did you do after the</p> <p>14 military?</p> <p>15 A. I worked as a respiratory therapist.</p> <p>16 Q. About how long did you do that for?</p> <p>17 A. About eight years.</p> <p>18 Q. Then what did you do?</p> <p>19 A. I worked in the newspaper business.</p> <p>20 Q. Were you a reporter?</p> <p>21 A. I was a circulation manager.</p> <p>22 Q. What's your current occupation?</p> <p>23 A. Right now I'm not working. I was</p> <p>24 working for a property here in Columbus, but</p>
<p>Page 7</p> <p>1 your last name for the record?</p> <p>2 A. Joseph Vaillancourt. V, as in Victor,</p> <p>3 A-I-L-L-A-N-C-O-U-R-T.</p> <p>4 Q. What is your current address?</p> <p>5 A. 5565 Esplanade Street, Columbus 43221.</p> <p>6 Q. What's a good telephone number for you?</p> <p>7 A. My cell number, 774-240-0121.</p> <p>8 Q. What's your date of birth?</p> <p>9 A. November 27th, 1950.</p> <p>10 Q. Are you married?</p> <p>11 A. Yes.</p> <p>12 Q. How long have you been married?</p> <p>13 A. Nine years.</p> <p>14 Q. Do you have any children?</p> <p>15 A. No.</p> <p>16 Q. Where did you go to high school?</p> <p>17 A. Lawrence Middle School in Lawrence,</p> <p>18 Massachusetts.</p> <p>19 Q. Did you grow up in Massachusetts?</p> <p>20 A. Yes.</p> <p>21 Q. Where did you go, if at all, to college?</p> <p>22 A. I went to a couple of schools. I went</p> <p>23 to Hesser College in Salem, New Hampshire. And</p> <p>24 I did some courses at Northeastern Community</p>	<p>Page 9</p> <p>1 right now I'm kind of semiretired.</p> <p>2 Q. What was the property?</p> <p>3 A. Sirens, which goes by Cleveland Avenue</p> <p>4 Cafe.</p> <p>5 Q. What was your role at Sirens?</p> <p>6 A. I was a day manager.</p> <p>7 Q. When did you start at Sirens?</p> <p>8 A. It was this year. I believe it was -- I</p> <p>9 only worked four, five weeks. It was like the</p> <p>10 end of February, February 9th or 10th through</p> <p>11 the 14th of March when the governor shut the</p> <p>12 clubs down.</p> <p>13 Q. Let's go to your employment at Kahoots,</p> <p>14 just some again questions there.</p> <p>15 What was your start date at Kahoots?</p> <p>16 A. I believe it was December 1st, 2005.</p> <p>17 Q. What was the last date you worked there?</p> <p>18 A. I believe it was November 19th, 2018.</p> <p>19 I'm not the best with dates, so hopefully -- I</p> <p>20 think it was 2018. It was November 19th.</p> <p>21 Q. You worked there about 12, 13 years?</p> <p>22 A. Yes.</p> <p>23 Q. What was your position?</p> <p>24 A. I was a general manager.</p>

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<p style="text-align: right;">Page 10</p> <p>1 Q. Were you always the general manager, or 2 were you promoted into that position? 3 A. I was hired as the general manager. 4 Q. You were hired as the general manager? 5 A. Yes. 6 Q. What were your job duties and 7 responsibilities as general manager? 8 A. I was responsible for the day-to-day 9 operations, pretty much overseeing the hiring, 10 training and, you know, managing the dancers, 11 staff. 12 Q. Did you play any sort of role in 13 bookkeeping? 14 A. No. 15 Q. Whose role was that? 16 A. Steve Kessler did most of the day work, 17 the paperwork, the ordering and financial end of 18 things. 19 Q. In your role as general manager, were 20 you required to know and understand the state 21 and local laws related to the industry that you 22 were in? 23 A. Yes. 24 Q. In your role as general manager, were</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Joe Sullo, the owner. 2 Q. When there was a -- when you noticed 3 some sort of criminal activity taking place in 4 the club, did you ever write it down or report 5 it anywhere? 6 A. We had a logbook. 7 Q. Was that logbook in place throughout the 8 course of your employment? 9 A. Yes. 10 Q. Did you write down every single criminal 11 activity that you noted or was noted in the 12 club? 13 A. As far as I can remember, yes. We 14 didn't have many. 15 Q. So was this logbook something that was 16 kept by hand, or was it kept electronically? 17 A. It was by hand. 18 Q. Can you kind of explain to me the nature 19 of this logbook, what it looked like? Was it 20 like a form you filled out, or was it a chart? 21 A. It was just, you know, kind of almost 22 like a calendar datebook. So you could turn to 23 a page, you would have the date on there, and if 24 there was anything you wanted to record, if</p>
<p style="text-align: right;">Page 11</p> <p>1 you required to monitor patrons', employees' 2 and dancers' compliance with those laws? 3 A. Yes. 4 Q. If you saw someone, be it a patron, 5 employee or dancer, not complying with those 6 state or local laws, what did you do? 7 A. It would depend on what I saw them 8 doing. 9 Q. So if you saw some sort of criminal 10 activity, whether it be prostitution or a drug 11 sale or something like that -- 12 A. Termination -- I'm sorry. 13 Q. -- what was your role? 14 A. I would terminate them. 15 Q. So if that was an employee or dancer, 16 you would terminate them? 17 A. Yes. 18 Q. What if it was a patron? 19 A. They would be told to leave and be 20 banned from the club. 21 Q. Who did you -- who was your direct 22 report? 23 A. Could you repeat that? 24 Q. Who did you report to?</p>	<p style="text-align: right;">Page 13</p> <p>1 there was an incident, you could record it under 2 that date. So it's just a hardcover datebook. 3 Q. And that was in place throughout the 13 4 years you were employed at Kahoots? 5 A. Yes. 6 Q. Did you, yourself, write in that book? 7 A. Yes. 8 Q. Did you send copies of the book to 9 management ever -- 10 A. No. 11 Q. -- or to ownership? 12 A. No. 13 Q. So that was something that stayed at 14 Kahoots at all times? 15 A. Yes. 16 Q. Do you have any knowledge as to where 17 that book might be today or if it still exists? 18 A. No knowledge. 19 Q. Did you have a role in hiring and firing 20 employees? 21 A. Yes. 22 Q. Were you in charge of scheduling? 23 A. I oversaw scheduling. 24 Q. Did you make decisions regarding</p>

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<p style="text-align: right;">Page 14</p> <p>1 dancers? And what I mean there is that you 2 would decide who would dance on certain nights. 3 A. They were independent contractors, a 4 tenant operator, so we didn't schedule them. 5 Q. Going back to the logbook that you were 6 talking about, I know you said you never 7 reported anything up to the ownership. Did you 8 ever report anything that you recorded in the 9 logbook to law enforcement? 10 A. I did, once. 11 Q. What were the circumstances of that? 12 A. Detective Rosser was in the club on what 13 they call a NAG investigation where they come in 14 with other officers and health officials and 15 CPD. The night they came in, they checked 16 everyone's ID, and everyone had ID, and they go 17 through the process. My assistant that night 18 was in the office with Detective Lancaster. 19 When they were through, they left, Detective 20 Rosser came back in looking for Lancaster. We 21 didn't know where Lancaster was. So we headed 22 to the office, and Lancaster was in the office 23 taking copies of the dancer files. 24 At that point, Detective Rosser asked me</p>	<p style="text-align: right;">Page 16</p> <p>1 your handwriting on that note? 2 A. Sometimes I have a hard time reading my 3 own handwriting. It looks like I terminated 4 Jeremy Sokol, and some of it is missing, but it 5 says for selling of drugs and, I would think, of 6 taking credit cards, forging and signing credit 7 cards. He was entering tips and signing 8 customers' names. That's the gist of that. 9 Q. Is that your signature on that sheet 10 there? 11 A. Yes. 12 Q. So that was the only occasion you recall 13 reporting something from this logbook to law 14 enforcement; is that correct? 15 A. I believe so, yes. 16 Q. In this logbook, there were other sorts 17 of criminal activities logged. Is that 18 accurate? 19 A. I would say that's not accurate. 20 Q. So what was in the logbook, then? 21 A. You know, if we let a dancer go, it was 22 kind of communicating to the next shift manager 23 that a particular dancer was sent home for 24 whatever reason.</p>
<p style="text-align: right;">Page 15</p> <p>1 why I terminated Jeremy Sokol. I gave him a 2 written statement similar to the statement I had 3 written in the logbook. I copied it, he wanted 4 it on a piece of paper, I copied it on a piece 5 of paper and gave it to him. I took it from the 6 logbook, what I wrote in the logbook. 7 Q. Do you recall what the statement was? 8 A. Not word-for-word, but the reason I 9 terminated Jeremy Sokol was that he was forging 10 credit card slips and selling marijuana inside 11 the nightclub. 12 --0-- 13 (Deposition Exhibit 1 marked.) 14 --0-- 15 Q. If you turn to tab 5 in that binder 16 that's in front of you, I know it's in black and 17 white and it may be a bit difficult to read, and 18 I know you told me you forgot your glasses so I 19 will bear with you. To the best of your 20 ability, does that look like the note that you 21 were just referencing? 22 A. It looks like it, yes. 23 Q. I'm having a little bit of trouble 24 reading your handwriting. Are you able to read</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. Would dancers be sent home because they 2 were violating some sort of law? 3 A. No. Primarily, most of the time it was 4 they were in an argument or they got into kind 5 of an argument with another dancer, being 6 disruptive in some way or had too much to drink, 7 so we would send them home. 8 If somebody was terminated for breaking 9 the law, that would be entered into that thing, 10 and usually that would either be, you know, not 11 wearing the proper costume or, you know, the use 12 of drugs, or solicitation of a customer. 13 Q. So those sorts of activities that you 14 were just describing, the use of drugs, any sort 15 of prostitution or exploitation of a patron, 16 those sorts of things would get tracked in that 17 logbook, in addition to dancers being let go for 18 arguments or drinking too much or whatever; is 19 that correct? 20 A. Yeah. And, in addition, if we hired 21 somebody, if there was new people coming on, it 22 was a means of communication, it wasn't just -- 23 it was a day-to-day, we would say if there was 24 something that I wanted the next manager to kind</p>

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<p style="text-align: right;">Page 18</p> <p>1 of remember or whatever. In most cases, it was 2 to document something that we wanted to have a 3 record of. 4 Q. What were the hours that you worked at 5 Kahoots? 6 A. I worked evenings. I worked five days a 7 week. I would go to work about 6:30, club 8 closed at 2:30. I would do my book work and get 9 home about 4:00 five days a week. 10 Q. Was that Monday through Friday? 11 A. I think most of the time I took, like, a 12 Sunday and a Monday off. 13 Q. Okay. 14 A. So I worked all the weekends. 15 Q. Were you an hourly paid employee or 16 salary? 17 A. Salary. 18 Q. And your supervisor, I think you said, 19 was Joe Sullo. Correct? 20 A. The owner, yes. 21 Q. During the course of your employment at 22 Kahoots, did you ever have any sort of criminal 23 charge brought against you? 24 A. At the end of my -- yes.</p>	<p style="text-align: right;">Page 20</p> <p>1 A. Yes. 2 Q. And the offense date, the 10-28-2017, 3 does that sound like about the time that you 4 were charged? 5 A. Yes. 6 Q. Regarding the circumstances of your 7 departure from Kahoots, you were terminated; is 8 that correct? 9 A. I guess so, yep. 10 Q. Who informed you that you had been 11 terminated? 12 A. Joe Sullo. 13 Q. What was the stated reason for your 14 termination? 15 A. He said that I had to go and Detective 16 Rosser wanted me gone, and he wanted Mr. Sullo 17 to bring Jeremy Sokol back to work. At first, I 18 guess the communication between Joe Sullo and 19 Mr. Rosser when they had that conversation, Joe 20 refused. I had been there 13 years, I did a 21 good job, and I didn't do anything wrong, in his 22 terms, and he wanted to fight this thing. I 23 guess there were a number of these citations for 24 dancing or, you know, being without pasties.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. What were the circumstances of those? 2 A. It was Detective Rosser cited me for a 3 girl that didn't have pasties on. 4 Q. Can you say that one more time? 5 A. Detective Rosser cited me for an 6 entertainer that wasn't wearing pasties. 7 Q. He cited you as opposed to the 8 entertainer? 9 A. He cited the entertainer, as well. 10 Q. What was the disposition of that 11 criminal charge, if you recall? 12 A. It was dismissed, eventually, by the 13 city attorney. 14 Q. Did you enter into any sort of plea in 15 that case? 16 A. Yes, I did. 17 Q. What did you plea? 18 A. I pled guilty. 19 Q. If you turn to tab 8 in that book, are 20 you the Joseph D. Vaillancourt that is 21 identified on there? 22 A. Yes. 23 Q. And that 5313 North County Road, is that 24 a former address of yours?</p>	<p style="text-align: right;">Page 21</p> <p>1 And from what Mr. Sullo told me, he felt 2 threatened by Mr. Rosser, that he would close 3 the club down if I did not leave. That's when I 4 was cited. And Rosser said that I couldn't work 5 if I had a criminal charge against me, even 6 though I had not had time to even defend it yet. 7 There was not any ordinance or law in the city 8 which stated that I was not allowed to work even 9 if I had been found guilty, that I couldn't work 10 in the adult business. 11 So Mr. Sullo asked me to take some time 12 and more or less laid me off. I shouldn't use 13 the word termination, I was laid off. I was 14 able to collect. I was laid off. He wanted to 15 see what he could do, he didn't want to lose me, 16 and he wanted to see what he could do to 17 straighten this thing out. 18 Q. When you say you were "laid off" and you 19 were "able to collect," what exactly do you mean 20 there? 21 A. I was laid off because there wasn't a 22 position there for me at that point. 23 Q. In terms of volume of business over the 24 course of your employment at Kahoots, over the</p>

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<p style="text-align: right;">Page 22</p> <p>1 13 years that you were there, what did it look 2 like? Was it a steady business, was it a 3 growing business? 4 A. It was pretty much -- it was pretty 5 steady, but it was pretty much a rollercoaster, 6 as well. Throughout those years, we had 7 economic problems. There were laws that were 8 put into place. Senate Bill 16 was one that 9 affected the business and was challenged in the 10 courts. But that slowed business down for a 11 year or two. I believe in 2008 we had, you 12 know, economically there was the recession. 13 Pretty much, it was a pretty steady business. 14 Compared to other adult nightclubs, we were one 15 of the more successful ones. 16 Q. When you say Senate Bill 16 and that 17 slowed business down, are you talking about the 18 implementation of the, I'll call it the no-touch 19 law, in Ohio? 20 A. The pasty law, yes. 21 Q. Are the pasty law and the no-touch law 22 the same law? 23 A. Yeah, Senate Bill 16 involved wearing 24 pasties and -- yeah, it involved wearing</p>	<p style="text-align: right;">Page 24</p> <p>1 A. Well, people thought that -- the 2 customers thought they could be given a citation 3 if they gave an entertainer a hug or shook a 4 hand or had a private dance. So they were 5 afraid to come into the nightclubs. 6 Q. In terms of the number of customers on 7 average, is that something that you kept track 8 of in your role as general manager? 9 A. Yes. 10 Q. How was that tracked? 11 A. The hostess at the front door would 12 track the number of customers that would come 13 through the door. 14 Q. So was that written down every night? 15 A. Yeah, it was put in our nightly reports. 16 Q. Were these nightly reports something 17 that were kept by hand or electronically? 18 A. They were kept by hand. 19 Q. That was on a per-night basis? 20 A. Yes, every night. Every day and every 21 night, day shift and night shift. 22 Q. What did you ultimately do with these 23 reports? 24 A. Steve would file them, fax them to the</p>
<p style="text-align: right;">Page 23</p> <p>1 pasties. 2 Q. What about the law that prevents patrons 3 and dancers from touching one another? 4 A. That wasn't covered by Senate Bill 16. 5 If you wore pasties -- under that bill, if the 6 entertainer wore pasties at all times, it wasn't 7 considered an adult business, so they were 8 allowed some contact. 9 Q. That was in Senate Bill 16, you're 10 talking about? 11 A. Yes. 12 Q. What about the Revised Code section, I 13 believe it's 2907.40, it was the Community 14 Defense Act, did you have knowledge of that and 15 when that was implemented? 16 A. That was part of Senate Bill 16. Yes. 17 Q. Okay. So that was part of Senate Bill 18 16? 19 A. Right. 20 Q. Are you saying when that law went into 21 effect it also had an impact on customers? 22 A. Yeah. There was a lot of misinformation 23 out there. 24 Q. What do you mean by that?</p>	<p style="text-align: right;">Page 25</p> <p>1 owner at night, and then he would put them away. 2 Q. What were considered your busiest nights 3 of the week? 4 A. Weekend. 5 Q. Did you have a night during the week 6 that was busier than other nights? 7 A. Maybe Thursday nights sometimes would be 8 a little bit busier than other nights. 9 Q. Did that stay pretty consistent 10 throughout the course of your employment? 11 A. Yes. 12 Q. In terms of, like, nightly income for 13 the club, you know, how much the club made, did 14 you track that sort of thing? 15 A. That was part of the nightly report. 16 Q. So you knew at the end of every night, 17 like, we had a good night or we had a bad night 18 tonight? 19 A. Yes. 20 Q. Did you record that somewhere? 21 A. On the report sheet, yes. 22 Q. The same report sheets are the ones 23 Steve faxed to the owners? 24 A. Yes.</p>

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<p style="text-align: right;">Page 26</p> <p>1 Q. And again, that was kept on a nightly 2 basis?</p> <p>3 A. Yes.</p> <p>4 Q. Did these numbers, you know, I know you 5 said it was a bit of a rollercoaster, but did it 6 stay pretty consistent throughout the course of 7 your employment?</p> <p>8 A. Yeah. You also had, sometimes, a couple 9 rough months, as any business did. I would say 10 it was pretty consistent. There was a range. 11 You could pretty much, you know, guess what 12 business was going to be like. It was a local, 13 small little nightclub. It wasn't a transient 14 type of business. The majority of people that 15 would come in were local people, regulars.</p> <p>16 Q. Did you have any responsibilities over 17 the payroll?</p> <p>18 A. Steve did the payroll, I mean, you know, 19 the waitresses got a particular wage, the floor 20 people, the security people got a particular 21 wage, and Steve would enter and do the payroll 22 every week. I was not in charge of the payroll, 23 as far as recording it and calling it into the 24 payroll company. I did not do that.</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Did you, yourself, find the bag of weed?</p> <p>2 A. No. It was given to me. I forget who 3 found it, but it was presented to me.</p> <p>4 Q. Who presented it to you?</p> <p>5 A. I don't remember.</p> <p>6 Q. Who was the bartender?</p> <p>7 A. Charlie. Her name was Charlie. And I 8 can't think of her last name right now. I have 9 to apologize, it's been a few years, but her 10 name was Charlie.</p> <p>11 Q. If we need to get in contact with 12 Charlie, would you know how to do that?</p> <p>13 A. Probably Steve who did the payroll was 14 more familiar with all their names. I had a lot 15 of people that worked there, and I don't 16 remember everyone's last name. Where Steve 17 would enter their names every week for payroll, 18 he would probably remember their names.</p> <p>19 Q. Are you aware of any drug use among the 20 employees or dancers at Kahoots?</p> <p>21 A. I never witnessed that at all.</p> <p>22 Q. Did you ever hear anything about it?</p> <p>23 A. You know, you hear a lot of things, but 24 there was never anything that was brought to me</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. What about with respect to at the end of 2 the year tax returns, did you have any 3 responsibility there?</p> <p>4 A. None at all.</p> <p>5 Q. Did you know at the end of the year once 6 taxes were filed what the club was generating in 7 income, according to the taxes?</p> <p>8 A. No.</p> <p>9 Q. I want to touch a little bit on some of 10 the illegal activity that may or may not have 11 been taking place at Kahoots during the course 12 of your employment.</p> <p>13 Are you aware of any drug sales that 14 were occurring at Kahoots?</p> <p>15 A. Other than Jeremy Sokol, no.</p> <p>16 Q. Explain to me again your knowledge of 17 Jeremy Sokol's drug sales.</p> <p>18 A. We had found the area where we had 19 worked we had found a bag of marijuana up in the 20 eaves of the room where he worked at. But there 21 was a bartender who witnessed him weighing out 22 marijuana on the scale in the kitchen.</p> <p>23 Q. Did you, yourself, ever witness that?</p> <p>24 A. No.</p>	<p style="text-align: right;">Page 29</p> <p>1 that showed me anything. I mean, you know, I 2 didn't see anything in there. I never caught 3 drugs on any employee or any dancer the whole 4 time I was there. What they do in their 5 personal life had nothing to do with me.</p> <p>6 Q. Sure. What about anyone's appearance 7 when they showed up at work, did you see anyone 8 that appeared they were using drugs?</p> <p>9 A. You know, sometimes someone would come 10 in looking a little rough around the edges, and 11 I probably sent them home. Whether or not they 12 were using drugs or didn't sleep, I don't know. 13 It's a business of appearances, as well.</p> <p>14 Q. How about any sort of drug trafficking 15 at Kahoots, are you aware if any of that was 16 taking place?</p> <p>17 A. No.</p> <p>18 Q. Underage, was that happening at Kahoots?</p> <p>19 A. Never had a problem.</p> <p>20 Q. How about underage dancing?</p> <p>21 A. Never had a problem.</p> <p>22 Q. Prostitution?</p> <p>23 A. Never had a problem.</p> <p>24 Q. Sex acts occurring between dancers and</p>

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1 patrons, are you aware of that occurring?
 2 **A. No, I'm not.**
 3 Q. Over the course of your employment with
 4 Kahoots, do you recall how many times the police
 5 were called to the club?
 6 **A. Very few times.**
 7 Q. By "very few," do you mean less than
 8 ten, less than 20?
 9 **A. I would say, you know -- I'm sure**
 10 **there's records on that. But I would say it's**
 11 **probably less than 20 times a year.**
 12 Q. Less than 20 times a year?
 13 **A. That's an estimate. I can't say for**
 14 **sure. It didn't happen often.**
 15 Q. If I represent to you that from 2009 to
 16 2019 the total times police were called to
 17 Kahoots was 159 times, would that be a fair
 18 estimate?
 19 **A. How many years was that?**
 20 Q. That's over the course of ten years,
 21 2009 to 2019.
 22 **A. So it's a little bit less than what I**
 23 **estimated.**
 24 Q. Okay. You said you consider that to be

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1 very few times?
 2 **A. Yes. Most of the time to have a**
 3 **customer removed or there was a fight or a**
 4 **problem in the parking lot with customers**
 5 **arguing or getting into trouble out there, we**
 6 **would have them removed.**
 7 Q. How about with respect to filing police
 8 reports, would you say that number is probably
 9 similar to the one you just estimated?
 10 **A. For people who filed police reports?**
 11 Q. Yeah, whether it was customers or you
 12 or --
 13 **A. I would say it's much less than that.**
 14 Q. Much less?
 15 **A. Yeah.**
 16 Q. Are you familiar with the name Joseph
 17 Whitaker?
 18 **A. Yes, I believe so.**
 19 Q. Who is that?
 20 **A. I believe he was a floorman for me.**
 21 Q. Did you say a floorman?
 22 **A. A security person, yes, I believe so.**
 23 Q. He was employed at Kahoots?
 24 **A. Yes.**

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1 Q. Do you recall having a conversation with
 2 Mr. Whitaker about a dancer named Aliana that
 3 was caught performing a sex act on a patron at
 4 Kahoots?
 5 **A. No.**
 6 Q. So are you saying you don't recall, or
 7 this never occurred?
 8 **A. I don't remember it. It never occurred.**
 9 **I don't remember it.**
 10 Q. Did you, yourself, ever have any sort of
 11 a romantic relationship with any of the
 12 employees or dancers at Kahoots over the course
 13 of your employment?
 14 **A. Yes. I did meet a woman that worked for**
 15 **me for a short time.**
 16 Q. What was her name?
 17 **A. Alisa.**
 18 Q. When was that, that you had this
 19 relationship with Alisa?
 20 **A. I believe it was maybe 2011, 2012.**
 21 **Something like that.**
 22 Q. She was a dancer at the time?
 23 **A. We had a platonic relationship. I never**
 24 **had any sexual relationship with any dancer or**

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1 **employee in that nightclub, never. It was truly**
 2 **a platonic relationship.**
 3 Q. Are you familiar with a dancer that went
 4 by the name of Vera?
 5 **A. I'm sorry?**
 6 Q. Vera, V-E-R-A?
 7 **A. Yes.**
 8 Q. How are you familiar with her?
 9 **A. She worked at the nightclub.**
 10 Q. When was she employed?
 11 **A. I don't remember. For maybe four, five**
 12 **years. The last four, five years, maybe 2014**
 13 **through 2018, maybe.**
 14 Q. Was there a dancer for a period of time
 15 when you first started working at Kahoots that
 16 stayed with you briefly and you also paid for a
 17 hotel for her?
 18 **A. No one ever stayed with me.**
 19 Q. Did you ever pay for a hotel for a
 20 dancer?
 21 **A. No. Not that I can remember, no.**
 22 Q. I'll take you back to 2005. The vice
 23 unit had received a thank-you letter from a
 24 dancer that had stated that she worked at

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<p style="text-align: right;">Page 34</p> <p>1 Kahoots. I just want to read you part of her 2 letter that she had sent to the vice unit, and I 3 want you to tell me if you have heard of this 4 person or if you agree or disagree with what she 5 wrote in her letter.</p> <p>6 She said she began working at Kahoots in 7 2005, she had just graduated high school -- I'm 8 paraphrasing some of the letter, I will quote it 9 here in a second. She said her parents threw 10 her out, I had no where to go, and Joe 11 Vaillancourt acted concerned and like he cared 12 about my situation. He let me stay with him 13 briefly and paid for my hotel until I was able 14 to get my own place.</p> <p>15 Does that ring any sort of bell for you?</p> <p>16 A. No one -- I would sometimes help out 17 people financially. If they needed a few bucks 18 to get a room, I would help them out, but no one 19 ever stayed with me.</p> <p>20 Q. This next part I'll quote specifically 21 for you. She says, During the month before I 22 saved up enough for an apartment rental, I was 23 obligated to do strange and gross favors for Joe 24 outside of work. I am not a hooker and never</p>	<p style="text-align: right;">Page 36</p> <p>1 8th, 2017. Were you employed at Kahoots during 2 this time?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. I'll give you a second to kind of 5 read through the narrative there.</p> <p>6 (Pause in proceedings.)</p> <p>7 Q. Have you ever seen this Crime Stoppers 8 tip before?</p> <p>9 A. No.</p> <p>10 Q. Do you know who this day management Kyle 11 person that they're referring to is?</p> <p>12 A. Yes.</p> <p>13 Q. Who is that?</p> <p>14 A. He was a security person.</p> <p>15 Q. Did he manage during the day?</p> <p>16 A. No. Steve was the day manager.</p> <p>17 Q. Any of the names that appear here, as 18 well, are you familiar with them, Kyli, Britney 19 or Marilyn?</p> <p>20 A. They sound familiar but, you know, I've 21 had thousands of girls work there, so I can't 22 say. And I never worked day shift, so I don't 23 know.</p> <p>24 Q. The narrative here regarding</p>
<p style="text-align: right;">Page 35</p> <p>1 slept with him, nor would I ever, but he would 2 make me beat his bare ass and testicles with a 3 plastic coat hanger while he called, Mama Bear.</p> <p>4 Does that ring any sort of the bells?</p> <p>5 A. No, nothing, that's never happened. 6 That sounds like something Jeremy Sokol would 7 say.</p> <p>8 Q. I'll quote her, she said, On one 9 occasion he even made me give him an enema with 10 an entire bottle of Tabasco sauce mixed in the 11 water bag. The fact that he's fired and I never 12 need to look at him again makes me feel like 13 that part of my life is officially over.</p> <p>14 Does that ring any sort of the bells for 15 you?</p> <p>16 A. No. Never happened.</p> <p>17 Q. I want to direct your attention to the 18 binder again. If you could look at tab 6, I 19 believe. Does it say Central Ohio Crime 20 Stoppers at the top?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Very good. This looks to be a 23 Crime Stoppers tip for law enforcement. It was 24 created, I see on the side there it says June</p>	<p style="text-align: right;">Page 37</p> <p>1 prostitution taking place at the club, did you 2 agree or disagree with that?</p> <p>3 A. I disagree. Do you want me to explain?</p> <p>4 Q. Sure.</p> <p>5 A. Many times in this industry girls who 6 are struggling or not making money blame the 7 fact that maybe somebody else is doing something 8 more than what they're doing. Sometimes it's 9 just they're bitter or they get into an argument 10 with somebody, or they think they can run the 11 club themselves by eliminating certain people 12 that are probably more successful than they are. 13 It's an industry thing that a lot of the times 14 the girls will say, I saw this, I saw this, I 15 saw that, you know, there are security people 16 there, managers there, and if that was ever 17 reported to the manager and he witnessed it, 18 they would be terminated.</p> <p>19 So these are things that sometimes, I 20 don't know how they see it, you know, what are 21 they, walking around and taking a look and 22 watching what everybody does? It just doesn't 23 happen. There's a lot of gossip, there's a lot 24 of drama that people talk about. It has to be</p>

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<p style="text-align: right;">Page 38</p> <p>1 reported to the manager, the manager has to 2 witness it, see it, watch it on the camera, 3 something. 4 But a lot of times these girls were 5 bitter or angry at other girls, and they figured 6 if they said negative things about other people 7 or called them names, accused them of stuff, 8 that they would be terminated. I wouldn't have 9 anybody working there if that was the case. It 10 would have to be investigated to make sure 11 people aren't bringing up falsehoods or making 12 up stories about me, like the girl who made up 13 the story about me with crazy stuff like that. 14 Q. Were these sorts of things, then, if it 15 was happening in the industry quite often, were 16 these things that were brought to your attention 17 at some point that you then had to do follow-ups 18 on? 19 A. If a girl came to me and said, I think 20 this is happening, we would research it, we 21 would look into it, we would watch that 22 particular entertainer to make sure that it 23 wasn't a fact. 24 Q. Were there times when you did confirm,</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. I don't have the time. It says on 2 Saturday. 3 A. I was working that date. 4 Q. Kahoots was your employer on that date. 5 Correct? 6 A. Yes. 7 Q. And the employee for the agent or the 8 individual noted is Shandyle Harrah. Are you 9 familiar with her? 10 A. No. 11 Q. If you turn, you'll have to turn a few 12 pages, so bear with me, it says Ohio Department 13 of Public Safety Investigative Unit liquor 14 violation information at the top. 15 A. Violation notice? 16 Q. It says, liquor violation information at 17 the top. 18 A. Okay. 19 Q. Let me know when you're there. 20 A. I think I'm there. 21 Q. If you look in the middle, do you see 22 the Shandyle Harrah, her name and address, and 23 then in the middle there's also a box that says, 24 it's hard to read, but I think it says, Person</p>
<p style="text-align: right;">Page 39</p> <p>1 indeed, that was happening in the club? 2 A. No. 3 Q. So there was never any sort of instances 4 where a girl came to you and said, you know, 5 so-and-so is prostituting or is, you know, 6 hooking up with patrons when she gives a private 7 dance and that sort of thing, you never 8 confirmed a scenario where that happened? 9 A. I never saw that, that I saw happen like 10 that on the property, that someone reported to 11 me that happened on the property. 12 Q. Mr. Vaillancourt, if you can flip to 13 number 9A in that binder. It should say, State 14 of Ohio Liquor Control Commission. It's a 15 notice of hearing. 16 A. Yep. 17 Q. Have you ever seen this document before? 18 A. No. 19 Q. The two violations that are noted in 20 there had occurred August 19th, 2017. You were 21 employed at Kahoots on that date. Correct? 22 A. What was the date? 23 Q. August 19th, 2017. 24 A. And the time?</p>	<p style="text-align: right;">Page 41</p> <p>1 in charge at time of violation, and I believe 2 that's your name, Joseph D. Vaillancourt, that 3 appears in the middle there. Is that accurate? 4 A. I guess so, yes. 5 Q. So you would have been the general 6 manager at the time that this violation 7 occurred. Correct? 8 A. Yes. 9 Q. If you flip back a page, it is kind of a 10 long narrative there. Do you see that? It 11 explains, essentially, what happened and why 12 there was a violation. Did you see this 13 narrative? 14 A. I believe so. 15 Q. It starts, and again it's kind of a 16 longer narrative, it says, On August the 18th, 17 2017 Detective Whitt met with, and then it goes 18 on from there. Are you there? 19 A. August 11th, you said? 20 Q. No. It says, On August 18th, 2017, 21 Detective Whitt met with, and it's a long 22 narrative. It was one page before the last page 23 we just looked at. 24 (Pause in proceedings.)</p>

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<p style="text-align: right;">Page 42</p> <p>1 Q. Are you with me on the long narrative 2 here talking about Ms. Harrah's violation? 3 A. Yes. 4 Q. Okay. And again, do you recall this 5 night specifically or Ms. Harrah specifically? 6 A. Yes, I do. 7 Q. You do recall Ms. Harrah? 8 A. I recall Malaysia. 9 Q. So you knew her by Malaysia? 10 A. Yeah. 11 Q. Okay. 12 A. I don't know their real names, to be 13 honest with you. Contractually, I only use 14 their dancer names. 15 Q. So you do remember Malaysia, who was a 16 dancer at Kahoots. Correct? 17 A. Yes. 18 Q. The allegations in here, and you can 19 take a second to read the narrative, if you 20 would like, the detectives had essentially 21 agreed to meet Ms. Harrah at the Varsity and she 22 had agreed it would cost \$300 each, and they 23 talk about kind of what they're going to do with 24 Malaysia.</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. This is an additional violation similar 2 to the one we just looked at. It looks like it 3 occurred Friday, September 29th, 2017. You were 4 employed at Kahoots during that timeframe. 5 Correct? 6 A. Yes. 7 Q. And again, if you flip to the 7th page 8 there it says, Liquor violation information at 9 the top. In the middle it has the name of the 10 individual that was charged, Danielle L. 11 Calderon. Are you familiar with her? 12 A. I don't know her name, but I'm sure she 13 worked at Kahoots. As I said, I only know their 14 dancing name. 15 Q. Underneath there it's person in charge 16 at that time of the violation, and that is your 17 name again, Joseph D. Vaillancourt? 18 A. Yes. 19 Q. So you were present the night this 20 violation was issued. Correct? 21 A. Correct. 22 Q. If you turn another page and then the 23 page after that, so turn two pages, again, we 24 have another smaller narrative here. This time,</p>
<p style="text-align: right;">Page 43</p> <p>1 You testified earlier that you don't 2 know of any sort of sex acts that were occurring 3 between patrons and dancers, but here we have a 4 night that you were general manager, and one of 5 the dancers was cited for improper sexual 6 activity at the club. Is that correct? 7 MR. KEYES: Just note my objection to 8 form. 9 A. There was no sex. 10 BY MR. GREEN: 11 Q. So there was no sex, but there was -- 12 A. Solicitation. 13 Q. -- solicitation? 14 A. Correct. That was conversation, yes. 15 Q. So you agree, then, that that was 16 occurring at Kahoots. Correct? 17 A. Yes. 18 Q. I want to turn to -- so that violation 19 was noted August 19, 2017. Let's move to 9M. 20 A. Yep. 21 Q. We have another notice from the Liquor 22 Control Commission, notice of hearing. Again, 23 have you ever seen this document before? 24 A. No.</p>	<p style="text-align: right;">Page 45</p> <p>1 it looks as though the dancer's name was Ella. 2 Does that name ring a bell to you? 3 A. What was it? 4 Q. Ella. 5 A. I can't say for sure, but I'm sure she 6 worked there, but I can't -- can I make a 7 statement? 8 Q. Say that again? 9 A. I would like to say something. 10 Q. Go ahead. 11 A. These are all under Senate Bill 16 which 12 was, by the city and the city attorney, found 13 unconstitutional. All these charges were 14 dismissed. Illegal sexual activity is dancing 15 without a pasty. It's not having sex inside the 16 nightclub, it's someone that dances without a 17 pasty. That's what it explains here. That's 18 what it's saying. 19 Q. Would -- 20 A. That's what Senate Bill 16 is. 21 Q. I'm sorry. I'll let you finish, I 22 promise, if you let me finish. 23 A. Okay. I'm just saying, I don't see, you 24 know, the Malaysia thing, that was solicitation,</p>

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<p style="text-align: right;">Page 46</p> <p>1 she had made a statement, and she never had her 2 day in court. The other charges that were 3 sexually-orientated business were, as far as I 4 know, from what I can see here, correct me if 5 I'm wrong, were for contact without pasties or 6 without wearing a pasty after the hours of 7 midnight. 8 Back in 2007 or 2008, Governor Kasich 9 said not to enforce Senate Bill 16 because it's 10 unconstitutional. But we stayed wearing 11 pasties, and we operated that way. At this 12 point, when these came up, they did many 13 investigations into the nightclub, and this is 14 what they came up with. Over 13, 14 years 15 there, you have got some girls that weren't 16 wearing pasties. And they had their day in 17 court and the city decided to turn it around 18 when it was unconstitutional. So I don't know, 19 these don't make any sense to me, they don't 20 apply. The city attorney turned them off. Am I 21 right? 22 Q. So is it your testimony that when these 23 violations were being issued the law was 24 unconstitutional at that time, or it was later</p>	<p style="text-align: right;">Page 48</p> <p>1 wasn't -- you know, I don't know. It was 2 certain towns and townships could enforce it or 3 not enforce it. It was not coming from Liquor 4 Control. It was a city -- it was a state law 5 that was left up to the individual townships and 6 cities if they wanted to enforce and if they 7 wanted to use Senate Bill 16. It was always 8 kind of a gray area. None of us really 9 understood what was going on. None of us really 10 understood it. 11 Q. It was a valid state law. I think we 12 both agree there -- 13 A. It was a valid state law. 14 Q. -- correct? 15 A. Correct. Which is no longer in effect. 16 Are we there? Are we correct with that? 17 Q. Is that your opinion? 18 A. Well, everyone's charges were dismissed. 19 In my case that I pled guilty to, the city 20 attorney reopened the case and discharged it. I 21 was the only manager in the entire state that's 22 ever been charged with that ruling, and it was 23 done to force me out of my job. I have 30 years 24 in this industry, and it's a reputable industry,</p>
<p style="text-align: right;">Page 47</p> <p>1 ruled unconstitutional? I'm confused as to what 2 your testimony is. 3 A. I was under the estimation -- I was 4 under the assumption that Senate Bill 16 was not 5 being enforced because in those number of years 6 they felt it was unconstitutional. And they 7 were told not to, from what I understand, 8 enforce the Senate Bill 16. 9 Q. Who is "they"? 10 A. There was a state-wide organization 11 called BACE, which oversees the laws and so on 12 throughout the state in the adult business. 13 Q. So BACE, in your estimation -- or your 14 testimony is BACE has enforcement authority? 15 A. No. They had interpretation of Senate 16 Bill 16, which was not being enforced because 17 they didn't want to get into the legal mumbo 18 jumbo of enforcing Senate Bill 16, so it hadn't 19 been from maybe a month after Senate Bill 16 20 went into effect. 21 Q. So a month after Senate Bill 16 went 22 into effect the law was never enforced? 23 A. Not that I can remember. No. Not that 24 often. I mean, I could be wrong, but it</p>	<p style="text-align: right;">Page 49</p> <p>1 and I represented myself in the highest form 2 that I could. I'm an honest individual. I 3 think that some of the things that are being 4 said here are totally unfair and are lies. This 5 is what they have to do to try to discredit me. 6 I was very fair to people. I did a lot of 7 things for a lot of people. 8 That one woman that we talked about that 9 I became personally in a friendship with, Alisa, 10 I married her. And I talked to the owner and I 11 said, I want to help her out. We have a 12 platonic relationship. I never laid a hand on 13 her, but I wanted to help her out. She was an 14 immigrant, she needed help. I cared about her. 15 We are very, very friendly. She was a great 16 friend for me, a great companion. And once we 17 started into that friendship, she no longer -- I 18 didn't want her to work at the nightclub. But 19 she went on to get her citizenship. 20 We brought her mom here, her mom has a 21 green card. I sponsored her mom. I'm not 22 saying that I'm any special human being, but I 23 wanted to help this person out. And I helped a 24 lot of people out. So I take offense at people,</p>

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<p style="text-align: right;">Page 50</p> <p>1 like these girls making up stories like this for 2 what reason? To try to discredit me. There's 3 no proof of that. It shouldn't be written on a 4 piece of paper. It's appalling. It's a sick 5 thing. I wouldn't have survived 30 years in 6 this industry if I was anything like that. 7 There are very few managers in this business 8 that can say they've lasted that many years in 9 this business. I don't drink. I don't do 10 drugs. I don't run around with the dancers. I 11 don't go bowling with a staff member. 12 So there was a lot of confusion about 13 Senate Bill 16 in this state. And it's not fair 14 to the club owners, not fair to people that work 15 here. On October 19th, I think, or 18th, 16 whenever it was that those citations were 17 written, I worked that night, that was a 18 Halloween party. Detective Rosser wrote eight 19 or nine citations on that one night all for the 20 same thing. What was he trying to do? How many 21 lap dances does this guy have to get, really, in 22 one day? I mean, I think it's been found out 23 under the federal investigation that this isn't 24 a good officer and what he was doing was wrong</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. Okay. That's Alisa? 2 A. Yes. 3 Q. You said she was an immigrant. Correct? 4 A. She was, yes. 5 Q. Did you say that you married her so that 6 she could obtain a green card? 7 A. I married her because I cared about her 8 and wanted to help her. I loved her. 9 Q. Okay. When you said you wanted to help 10 her, what do you mean by that? 11 A. She wanted to stay here in the United 12 States. 13 Q. Okay. So you married her so she could 14 become a U.S. citizen? 15 A. That wasn't the only reason. 16 Q. That was one of the reasons, though? 17 A. That was -- yes. 18 Q. Thank you for clarifying that. 19 A. Yep. 20 Q. Some of the employees you worked with at 21 Kahoots, I want to cover a few of them and give 22 me their duties and responsibilities. I think 23 we talked about Steve Kessler. He was the day 24 manager and kind of the accounting person. Is</p>
<p style="text-align: right;">Page 51</p> <p>1 and he was setting people up. 2 Jeremy Sokol was a rat. He forced Joe 3 Sullo to put this bad guy back into the night 4 club. Because Joe was afraid of losing the 5 nightclub, he don't want Jeremy in there. The 6 day Joe Sullo told me what Rosser said to him, 7 Joe's response to Rosser was that I would rather 8 lock the doors than bring that guy back in here. 9 Why would an owner want to bring in somebody who 10 stole and sold drugs? 11 So I appreciate you giving me the time 12 to make my statement. I have to use the 13 restroom, if you don't mind. Can I take a 14 break? 15 MR. GREEN: Sure, we can take five, 16 that's absolutely fine. 17 (Recess taken.) 18 BY MR. GREEN: 19 Q. Mr. Vaillancourt, I want to clarify a 20 couple things. You were talking for a minute 21 and you lost me, I want to be sure I'm clear. 22 The platonic relationship that you had 23 referenced, is that now your wife? 24 A. Yes.</p>	<p style="text-align: right;">Page 53</p> <p>1 that accurate? 2 A. Yes. 3 Q. Are you aware of any illegal activity 4 that Steve Kessler was involved in while he was 5 at Kahoots? 6 A. No. 7 Q. Chris Jobin, what was his role at 8 Kahoots? 9 A. When I met Chris, he had worked there as 10 a floorman for a number of years and was 11 unemployed at the time I was hired. A short 12 time after that, I hired him as a manager. 13 Q. Were you aware of any illegal activity 14 that Chris Jobin was involved in at Kahoots? 15 A. None. 16 Q. Travis Brand, who is that? 17 A. He was my assistant manager. 18 Q. Are you aware of any sort of illegal 19 activity that Travis Brand was involved in? 20 A. No, none. 21 Q. Kyle Koch, K-O-C-H, who is that? 22 A. He was a floorman. 23 Q. Are you aware of any sort of illegal 24 activity that Kyle was involved in at Kahoots?</p>

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1 A. Not while he worked with me.
 2 Q. What about when he didn't work with you?
 3 A. I have no evidence. I heard certain
 4 things, but I have -- I can't say.
 5 Q. You have no personal knowledge of --
 6 A. I have no personal knowledge, I just
 7 hear things.
 8 Q. It was just rumors --
 9 A. Rumors about Kyle, stuff that was going
 10 on after I had left the club, after I was gone.
 11 Q. Was that while Kyle was still employed
 12 at Kahoots?
 13 A. Yes.
 14 Q. Again, those were rumors about drug
 15 sales?
 16 A. Yes.
 17 Q. I think we covered Jeremy Sokol, for the
 18 most part. Did you terminate Jeremy Sokol?
 19 A. Yes.
 20 Q. When exactly did you terminate him?
 21 A. Sometime in October of 2018, I believe,
 22 if I can remember. End of September, beginning
 23 of September, something like that.
 24 Q. And again, your reasoning for

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1 termination of Mr. Sokol was someone presented
 2 you a bag of marijuana and said it's Jeremy's.
 3 Is that accurate?
 4 A. That and falsifying information on a
 5 credit card, entering gratuities and falsifying
 6 a name. Also, he was witnessed by the bartender
 7 weighing out a big bag of marijuana on the
 8 kitchen scale.
 9 Q. Regarding the credit card, did you
 10 witness that, or did another employee witness
 11 that, how did you get knowledge of that?
 12 A. It was called in by the customer, so we
 13 researched it and pulled it up and saw that, you
 14 know, that the customer was denying that he
 15 wrote those gratuities in. So we could see that
 16 wasn't his signature and that the tips -- that
 17 was the night Jeremy was working, and he had
 18 control of that man's receipts and was entering
 19 it on his own.
 20 Q. What about Greg Flag, who is Greg Flag?
 21 A. Greg Flag works for BACE. He's the
 22 executive director of BACE.
 23 Q. What is his role with respect to
 24 Kahoots?

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1 A. Nothing really, he just works for BACE.
 2 I think he sells some clothing from time to
 3 time. He had dancewear that he sold there, as
 4 well.
 5 Q. Were you working with Mr. Flag at any
 6 point in time to learn information about the
 7 investigation that was going on into Kahoots?
 8 A. No.
 9 Q. How about any bartenders, did you have
 10 any main bartenders that worked there throughout
 11 the course of your employment that would have
 12 knowledge about some of the things that were
 13 going on at Kahoots?
 14 A. What things?
 15 Q. Just the things that we've been talking
 16 about today.
 17 A. No. They wouldn't know if someone had a
 18 pasty on or not. I mean, it wasn't, you know --
 19 that's what you got at Kahoots. You don't have
 20 any drug use, you don't have any prostitution
 21 going on there, you have got a bunch of
 22 citations that are for Senate Bill 16 for sexual
 23 activity after midnight, because they didn't
 24 have a pasty on and they never got their day in

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1 court. They wouldn't know that. They were
 2 bartenders. They had nothing to do with the
 3 dancers.
 4 Q. Going back to Greg Flag for just a
 5 second, what sort of consultations did you have
 6 with Mr. Flag, if any?
 7 A. Most of the time it was just about
 8 general stuff about business. He was a friend.
 9 I was also vice president of BACE, the state
 10 organization. So we would talk about business
 11 and trends happening in the business and stuff
 12 like that.
 13 Q. Regarding the ownership and talking
 14 about Michael Grant, Joe Sullo, how involved
 15 were they in the day-to-day of the club?
 16 A. I didn't see the Grants that often.
 17 They live in Connecticut, and Joe lives in
 18 Connecticut. Joe would come up once a month or
 19 we would talk on the phone a few times
 20 throughout the month. That's about it.
 21 Q. So is it fair to say they essentially
 22 entrusted the club to you to operate through the
 23 day-to-day?
 24 A. For the day-to-day operations, yes. Joe

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<p style="text-align: right;">Page 58</p> <p>1 did a lot of communication with Steve. I work 2 nights. Joe was a day guy. He had businesses 3 and so forth in Connecticut, so a lot of times 4 he would communicate with Steve about numbers 5 and other situations. And by the time I got in, 6 Joe had called it a night, was home and sitting 7 with his family. 8 Q. I want to talk specifically now about 9 your interactions with Officers Rosser and/or 10 Lancaster, if any. Did you have any direct 11 communication with Officer Rosser? 12 A. Just on the night that he came in on the 13 NAG investigation. 14 Q. I think you said that was in October. 15 A. Yeah, it was somewhere around there, I 16 forget. Somewhere around there, yeah. 17 Q. What was the nature of your 18 communication with him? 19 A. He came back to the office. He walked 20 in with a bunch of other officers in a NAG 21 investigation. And what you do is shut 22 everything down, the customers leave. It was 23 early in the evening. He asked everyone for 24 their ID's and information. They had officers</p>	<p style="text-align: right;">Page 60</p> <p>1 Sokol is a scumbag. All right? He's a habitual 2 liar. He's a bad guy. I should have never 3 hired him. It's the biggest mistake I made in 4 that club in the 14 years I was there, was 5 hiring that fool. I paid the price for it. I'm 6 sitting here now listening to stories about 7 enemas and all sorts of crap and phony stories. 8 My career ended. I didn't do anything wrong. I 9 tried to run a good nightclub. The city here 10 had problems with enforcing certain rules we 11 weren't clear on, and I never allowed anything 12 bad to happen inside that nightclub, and if it 13 did, they were removed. 14 I made that clear to Rosser that 15 evening, as well. He knew who I was. He knew 16 what type of manager I was. He's been in these 17 other nightclubs. He told me that if I ever 18 found that if I hear anything about Jeremy to 19 let him know and he was going to put Jeremy out 20 of business. So I was pretty surprised when, 21 you know, Joe Sullo comes into town. And on 22 that day Detective Rosser, I believe, was 23 talking to Steve in the morning or in the 24 afternoon in the club in the office, and when</p>
<p style="text-align: right;">Page 59</p> <p>1 walking around the club looking at stuff, going 2 downstairs in the dressing room. My turn came 3 up, he asked me my name. He was under disguise, 4 he had a mask on. I gave him my ID. He asked 5 me my name and address, and I gave it to him. 6 And he said, fine, that's it, then he left. I 7 said, was there anything? He goes, no. He came 8 back in, they all left. Lancaster was still in 9 the office with Travis, and they came back, he 10 came back in looking for Detective Lancaster. 11 They were in my office. 12 So we walked down to the office. And 13 that's the only communication that I had with 14 Rosser at that point when he asked me about 15 Jeremy. I said to him, I said, this is a bad 16 guy. And he goes, yeah, I know, I know Jeremy 17 is a bad guy. I said, I heard he's going to try 18 to get over at Vanity. Detective Rosser said, 19 no, I already talked to Abe. So he's 20 communicating with Abe, who is the owner of 21 Vanity. We shook hands. 22 He said, I'm going to make sure this 23 guy, Jeremy Sokol, never works in this business 24 again. And I felt good about that. Jeremy</p>	<p style="text-align: right;">Page 61</p> <p>1 Joe Sullo came in Joe asked Steve who was on the 2 phone. Steve said, it's Detective Rosser, he 3 wants this information about certain dancers and 4 Joe said, let me talk to him. That's when 5 Detective Rosser told him to get rid of me and 6 bring Jeremy Sokol back. 7 This guy just told me he was a bad guy 8 and he was going to put this Jeremy Sokol out of 9 the industry, and now he wants to bring him back 10 into the nightclub. Sullo was confused. He's 11 from Connecticut/New York, he said, I have never 12 been hustled that way even from wise guys. The 13 guy is threatening me, I don't know what to do. 14 It was confusing to me. 15 Q. Was that your only communication with 16 Officer Rosser, was that night? 17 A. Yes. 18 Q. What about Officer Lancaster, any 19 communication with him at any point? 20 A. No. 21 Q. Did you ever observe Officer Rosser or 22 Officer Lancaster doing anything illegal or 23 improper at Kahoots? 24 A. I didn't know who they were. No.</p>

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<p style="text-align: right;">Page 62</p> <p>1 Q. So you never knew any sort of 2 information about Officer Rosser or Officer 3 Lancaster that they were, you know, meeting up 4 with girls or doing any sort of drugs at the 5 club or anything like that? 6 A. I'm not in that line of communication. 7 I never heard anything. I did my job and I went 8 home. 9 Q. Were you aware of the recommendations 10 that Officer Rosser and Officer Lancaster were 11 making to the attorney at Kahoots, Dave Raber, 12 and ownership about improving the way that 13 Kahoots was running? 14 A. I never had any contact with -- I never 15 spoke to Dave Raber or any of those people. 16 Q. So you have no knowledge about the 17 recommendations made by Rosser and Lancaster? 18 A. I think I was gone at that point. 19 Q. I want to talk about Senate Bill 16, I 20 call it Ohio's no-touch law. I think we agreed 21 earlier that it was a valid law in Ohio when you 22 were employed at Kahoots. Correct? 23 A. Correct. 24 Q. And you knew that. Correct?</p>	<p style="text-align: right;">Page 64</p> <p>1 and so on and what you could say to customers 2 and what you can't say to customers and so on. 3 Q. You don't remember whether or not you 4 created this document? 5 A. I didn't create it, no. 6 Q. If someone was going to create it, who 7 would have been the person to create this? 8 A. Steve did a lot of that work, but I 9 can't say that he did this. But Steve had the 10 writing ability, I didn't. 11 Q. What was the purpose behind a sign like 12 this at Kahoots? 13 A. I think that sometimes you wanted the 14 dancer not to make up phony stories about, you 15 know, meeting somebody or doing something to 16 sell a dance, you know. The customers would 17 come in, hey, can you meet me after work, can we 18 go bowling, can we go have a drink, can you come 19 to my house. And sometimes they would just go 20 along with it because they want to sell a dance. 21 We have security in the parking lot, no 22 one -- we have a list of the dancers, how they 23 get there, the vehicle they came in or the ride. 24 No one ever left that property -- no one was</p>
<p style="text-align: right;">Page 63</p> <p>1 A. Correct. 2 Q. How did management go about implementing 3 this law at Kahoots? 4 A. We made sure that everybody had the 5 proper costumes and had pasties. We would 6 supply the material that the girls would wear to 7 cover themselves up with. We would train floor 8 hosts to make sure that the proper things were 9 going on. 10 Q. So you informed the dancers regarding 11 the law. Correct? 12 A. Correct. 13 Q. Turn to tab 3 in that binder. Do you 14 see the document that says, Attention every 15 entertainer? 16 A. I see it. I read it. 17 Q. Are you familiar with this? It looks 18 like a photo of a sign. Are you familiar with 19 this? 20 A. Not particularly. I mean, there was a 21 lot of stuff on the walls; rules, regulations, 22 stuff like that. I don't remember this one in 23 particular. But there were rules about proper 24 conduct and how to -- what you had to be wearing</p>	<p style="text-align: right;">Page 65</p> <p>1 allowed to leave in anybody else's car than the 2 one they came in. If somebody did, they would 3 be terminated. So we were very tight on that. 4 I think they were just explaining -- these were 5 young kids, they don't know what to do. They 6 come in and they're trying to sell a dance, the 7 customers are probably trying to lead them on to 8 something more. 9 We just wanted to keep it fantasy and 10 not a reality. But it's conversation, but it's 11 just a fantasy, there's nothing going on. 12 Q. Can you flip to tab 4? It's titled, 13 Kahoots charges. Have you ever seen this 14 document before? 15 A. No. 16 Q. Do you recognize any of the names on 17 this document? 18 A. Yeah, my name. 19 Q. What about any of the other names? 20 A. There's a couple that I know. 21 Q. But again, you don't know -- when it 22 says Kahoots charges, you don't know what that 23 means? 24 A. I think -- to be honest with you, I</p>

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<p style="text-align: right;">Page 66</p> <p>1 think this was published by Greg Flag in his 2 magazine. 3 Q. Which magazine? 4 A. What's it called? It goes around to all 5 the nightclubs. It's a nightclub magazine. I 6 forget what it's called. It's put out by Greg 7 Flag. 8 Q. Again, if you know, the charges 9 referenced in here, is this the Revised Code 10 section that's 2907.40, Ohio's no-touch law for 11 the Community Defense Act? 12 A. Yes. 13 Q. Again, you said management informed the 14 employees and the dancers about this law. 15 Correct? 16 A. The dancers. 17 Q. The dancers, yeah. So you talked to the 18 dancers about -- 19 A. Well, yeah, a lot of the dancers worked 20 at other nightclubs, they know the rules, and 21 they come in and make sure, when we interview 22 them we go over everything. 23 Q. What was your role, as far as 24 determining that dancers and the patrons were</p>	<p style="text-align: right;">Page 68</p> <p>1 everybody was doing the right thing. You have a 2 handful of people out of hundreds of people that 3 worked at the nightclub over a period of -- I 4 was there 14 years. All these citations came up 5 in one month or two months, when Jeremy Sokol 6 was there. 7 Q. During the course of your time, did you 8 keep any sort of personal records or notes, 9 journals, diaries, about your time at Kahoots? 10 A. No. 11 Q. Did you take any photographs? 12 A. No. I barely know how my cell phone 13 works. 14 Q. Any employees that we haven't talked 15 about today that you think would be a key 16 employee that would be a good person to talk to 17 that would have some more information? 18 A. Not that I can think of. 19 MR. GREEN: I don't have any more 20 questions at the moment. 21 THE WITNESS: Well, you know, to answer 22 your question, I think there's a lot of 23 employees, a lot of dancers that have worked for 24 me over the years. And I can't -- you know, it</p>
<p style="text-align: right;">Page 67</p> <p>1 complying with 2907.40? 2 A. Could you say that again? 3 Q. What was your role as general manager in 4 determining that the dancers and patrons were 5 complying with Ohio's no-touch law? 6 A. To make sure that it's being enforced. 7 Q. How did you go about doing that? 8 A. You watch the girls on stage, you know, 9 you hire the right types of people, you think 10 you're doing the right thing, you have security 11 people. I don't watch every dance that took 12 place. I'm on the floor. There's a lot of 13 things that I have to do. We didn't have 14 problems. If there was a problem, you could 15 sense there was a problem, you could sense if 16 there was a girl that you had an issue with, or 17 you could tell that she wasn't abiding by 18 things, you know. It's hard to -- it's a very 19 difficult thing to watch if they're not facing 20 you, the room is dark, they take a pasty off. 21 It's hard to see sometimes, it's hard to catch. 22 But I relied on security people to observe that. 23 And they strolled the areas where the private 24 dances were, and they would watch and make sure</p>	<p style="text-align: right;">Page 69</p> <p>1 doesn't really matter at this point, but you 2 don't want those types of people. You want the 3 people that make up phony statements and 4 statements like that. So I'm not going to get 5 anybody else involved in this. 6 MR. GREEN: Thank you. Some of the 7 other attorneys on the call may have some 8 questions for you, so I will let them go ahead 9 now. 10 EXAMINATION 11 BY MS. NOBLE: 12 Q. Good afternoon, Mr. Vaillancourt. My 13 name is Andria Noble, and I represent the city 14 of Columbus. Would you prefer that I call you 15 Joe, Joseph or Mr. Vaillancourt? 16 A. Joe is good. 17 Q. Okay. When you received your notice of 18 the deposition, did you do anything to prepare 19 for your deposition today? 20 A. No. 21 Q. Did you review any documents? 22 A. No. 23 Q. Did you speak to anyone about it? 24 A. Steve Kessler called me and I said,</p>

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1 yeah, that's the only person I spoke to.
 2 Q. When you spoke to Steve Kessler about
 3 it, what was your conversation about?
 4 A. Just about what time he was going. He
 5 got the notice before I did. Generally, after
 6 that he was asking me about my health, how I was
 7 doing and personal things, nothing about the
 8 club.
 9 Q. Aside from just saying I have it on X
 10 date at this time, you did not speak about the
 11 substance of your testimony today?
 12 A. No.
 13 Q. Okay. You indicated that you started
 14 working at Kahoots in December of 2015 and you
 15 were the general manager --
 16 A. 2005.
 17 Q. 2005. I wrote that down and I said it
 18 wrong, so thank you for correcting me.
 19 A. Okay.
 20 Q. You were the general manager the whole
 21 time; is that correct?
 22 A. Yep.
 23 Q. What did you do to get your job?
 24 A. I interviewed with Joe Sullo. I was

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1 living at the time in the Boston area working
 2 out there. He was -- Joe was building a club in
 3 New York, a brand-new nightclub in Manhattan. I
 4 interviewed for that position and I was hired
 5 for that position. But he was not happy with
 6 the general manager that he had here in Columbus
 7 and wanted to know if I would prefer to come to
 8 Columbus. That was fine for me. I really
 9 wasn't looking forward to moving to New York
 10 City at my age. Maybe if I was younger it would
 11 have been a lot of fun, but it's a lot of work,
 12 and I prefer smaller clubs and smaller venues.
 13 We flew out here, I saw the club, and we made a
 14 deal and I came to work.
 15 Q. Did you ever start working at that club
 16 in New York or no?
 17 A. No. It was never even -- no.
 18 Q. Did you know Joe Sullo before you
 19 interviewed for that job in New York?
 20 A. No.
 21 Q. How did you get to applying for that job
 22 in New York?
 23 A. He knew a man that I worked for for a
 24 number of years in Rhode Island. They were very

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1 good friends. And I have a very good
 2 reputation. So Joe was looking for someone of
 3 quality, and this man that I worked for who had
 4 been in the business for a number of years, 30
 5 years, was a well-respected business owner. And
 6 Joe came to him and said, hey, I'm looking for
 7 somebody. And at the time I was available, and
 8 that's how I met Joe, through a guy I worked for
 9 that was a mutual friend of Joe and myself.
 10 Q. You were involved in the hiring and
 11 firing of employees while you were working
 12 there; is that correct?
 13 A. Along with other managers, yes.
 14 Q. What type of interview process did you
 15 have for employees?
 16 A. Pretty much, we would talk about their
 17 history, their work experience, where they're
 18 from, what's going on in their life, so I could
 19 get a pretty good feel of what type of person
 20 they were.
 21 Q. What was the interview process like for
 22 dancers?
 23 A. The same.
 24 Q. Did they ever have to audition in order

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1 to get a time slot?
 2 A. I very rarely did auditions, very
 3 rarely. I mean, I could tell by looking at
 4 somebody if they were attractive. But what was
 5 important to me was their personality and if
 6 they looked good, if they looked bright, if they
 7 weren't coming in looking strung out from
 8 drinking, dressed properly, looked healthy.
 9 Through that process, I could pick out fresh --
 10 a lot of times where they worked, if they worked
 11 before, if they didn't work before, if this is
 12 the first time they're walking into the club,
 13 why they want this type of job, are they going
 14 to school, do they need to pay tuition, do they
 15 have kids. It was getting to know somebody, and
 16 I wanted them to get to know me, as well.
 17 Q. You indicated you were a salaried
 18 employee?
 19 A. Yes.
 20 Q. Who were you paid by, the company or the
 21 dancers?
 22 A. The company.
 23 Q. Were you paid in cash or check?
 24 A. Check.

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1 Q. How frequently were you paid?

2 **A. Once a week.**

3 Q. I'm sure your compensation likely

4 changed over the course of 14 years, but do you

5 recall what you were paid at the end of your

6 time there?

7 **A. The same amount of money from day one.**

8 **I never got a pay raise.**

9 Q. Okay. What was that amount?

10 **A. I never got a pay raise, I never asked**

11 **for one. I was happy with what I was making.**

12 Q. What was your salary?

13 **A. \$1,500 a week.**

14 Q. Thank you. Can you tell me all of the

15 different positions of people that worked at

16 Kahoots, whether they were employees or

17 independent contractors?

18 **A. What do you mean?**

19 Q. Like, I know there's dancers and servers

20 and hostesses and bartenders and managers.

21 There might be other positions that I'm unaware

22 of. So if you could, give me all the different

23 types of positions in the club.

24 **A. Other than there's a guy that works in**

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1 **the bathroom. He doesn't work for me. It's a**

2 **gentlemen's club, we have a guy that works in**

3 **the bathroom that hands out soap and colognes**

4 **and gum and candies. Other than that, you have**

5 **servers, bartenders, hostesses, kitchen staff.**

6 **So you had cooks, security people, you had DJs,**

7 **you had a house mom, and you had dancers, and we**

8 **had a promotional person from time to time.**

9 Q. Okay. Were the -- I'm going to try to

10 get this right. The DJ and the house mom, were

11 they paid by the company or were they paid by

12 the dancers?

13 **A. They were paid by the dancers.**

14 Q. Do you know how much they were paid?

15 **A. No. There's a minimum tip-out, but that**

16 **was up to the dancers.**

17 Q. Okay.

18 **A. If they didn't have money, then they**

19 **worked that out with the house mom and DJ. I**

20 **didn't get involved -- managers didn't get**

21 **involved with their tip-outs.**

22 Q. Okay. Did security get tipped by the

23 dancers?

24 **A. There was no mandatory tip-out for**

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1 **dancers to security people, so no, they didn't**

2 **get any tip-out.**

3 Q. Okay. Was security paid by Kahoots?

4 **A. Yes.**

5 Q. Were the servers paid by Kahoots?

6 **A. Yes.**

7 Q. And the bartender?

8 **A. Yes.**

9 Q. And the hostess?

10 **A. Yes.**

11 Q. Were all of those people paid by cash or

12 check?

13 **A. All check.**

14 Q. Were they paid weekly --

15 **A. Yes.**

16 Q. -- as well?

17 **A. Yes, through a payroll company.**

18 Q. Did Kahoots pay the dancers at all?

19 **A. No.**

20 Q. Was the club paid by the dancers?

21 **A. They paid a rental fee, house fee.**

22 Q. Do you know what that rental fee was?

23 **A. It was based on shift time and the time**

24 **of arrival. So it would range anywhere from,**

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1 **like, \$10 to \$30.**

2 Q. Did they have to pay Kahoots if they did

3 any private dances?

4 **A. The club collected -- they didn't pay,**

5 **the club collected money for the use of that**

6 **space. Do you follow me?**

7 Q. I'm going to ask a follow-up question,

8 because I don't.

9 **A. Okay.**

10 Q. Did the patrons pay the club and then

11 the club paid out the dancers, or did the

12 patrons pay the dancers and then the dancers

13 paid the club?

14 **A. Either/or. The dance was \$30. So if**

15 **the customer gave the \$30 to the floor security**

16 **person in that area, he would pay the club \$10,**

17 **because the club is renting that space for \$10**

18 **per dance. The dancer collects \$20 per dance.**

19 **If the customer gives the money to the dancer,**

20 **she gives the \$10 to the floorman for the club,**

21 **and she keeps her \$20.**

22 Q. Thank you for that explanation.

23 **A. Yeah.**

24 Q. From my understanding, there's, like, a

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<p style="text-align: right;">Page 78</p> <p>1 VIP or a champagne room; is that correct?</p> <p>2 A. Correct.</p> <p>3 Q. Do you recall the price that that was?</p> <p>4 A. I believe it was \$250 a half hour.</p> <p>5 Q. How much of that \$250 went to the club</p> <p>6 and how much went to the dancer?</p> <p>7 A. \$150 to the dancer and \$100 to the club.</p> <p>8 Q. Okay. Did you or anyone else at Kahoots</p> <p>9 give dancers receipts at the end of the night</p> <p>10 indicating how much they paid the club for that</p> <p>11 night?</p> <p>12 A. The only thing they paid the club for</p> <p>13 was their house fee.</p> <p>14 Q. I mean the rental fee and then also any</p> <p>15 time they had a dance. Correct?</p> <p>16 A. That's not their money. The \$250, out</p> <p>17 of that the only money that was theirs was the</p> <p>18 \$150. The \$100 isn't theirs, it's the</p> <p>19 nightclub's. So they weren't paying the club</p> <p>20 the money.</p> <p>21 Q. Did you give the dancers a receipt for</p> <p>22 their house fees?</p> <p>23 A. No.</p> <p>24 Q. You and Chris talked about Greg Flag.</p>	<p style="text-align: right;">Page 80</p> <p>1 Q. You indicated that you also used to be,</p> <p>2 I think, a V.P. of BACE; is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. At that time, was Greg Flag also working</p> <p>5 with BACE at the same time?</p> <p>6 A. Not in the beginning when I was there,</p> <p>7 but most of the time he was there, yeah.</p> <p>8 Q. Okay. Would you say that you have a</p> <p>9 good relationship with him?</p> <p>10 A. Yep, I think.</p> <p>11 Q. Did you meet with him on property?</p> <p>12 A. Just on property.</p> <p>13 Q. Based on the timeline -- I think I know</p> <p>14 this answer, but I want to hear it from you --</p> <p>15 were you involved in the decision to sell the</p> <p>16 location?</p> <p>17 A. No.</p> <p>18 Q. I want to start talking about Jeremy</p> <p>19 Sokol.</p> <p>20 A. Beautiful.</p> <p>21 Q. Did you ever witness him committing a</p> <p>22 crime?</p> <p>23 A. Yes.</p> <p>24 Q. What crime did you personally witness</p>
<p style="text-align: right;">Page 79</p> <p>1 I'm going to ask some more questions about him.</p> <p>2 What exactly is BACE?</p> <p>3 A. BACE is a state-wide organization that</p> <p>4 belongs to a national organization called ACE.</p> <p>5 It's just a representation of the adult</p> <p>6 nightclub industry and it covers everything from</p> <p>7 friends to software to managing to Facebooks to</p> <p>8 all sorts of things. So everything that has to</p> <p>9 do with adult nightclubs and the day-to-day</p> <p>10 operation comes under BACE. It's also -- they</p> <p>11 also have representation that oversees certain</p> <p>12 state laws, depending on what's going on, and</p> <p>13 keeping the club owners updated as to trends</p> <p>14 that are happening nationally.</p> <p>15 Q. Okay. They are not an actual arm of the</p> <p>16 State of Ohio; is that correct?</p> <p>17 A. No. I don't think they're actually</p> <p>18 functioning right now. For many years -- it's</p> <p>19 the Buckeye Association of Club Owners,</p> <p>20 something like that is what that is.</p> <p>21 Q. Okay. Did Kahoots ever pay Greg Flag</p> <p>22 for anything?</p> <p>23 A. We used to buy some of the pasty tape</p> <p>24 from him, and we advertised in his magazine.</p>	<p style="text-align: right;">Page 81</p> <p>1 him commit?</p> <p>2 A. Taking a bet. He took a bet from</p> <p>3 somebody. He was taking bets and putting them</p> <p>4 through a bookie.</p> <p>5 Q. When did this occur?</p> <p>6 A. I don't remember.</p> <p>7 Q. Did you write it down anywhere?</p> <p>8 A. I don't believe so, no. I confronted</p> <p>9 him.</p> <p>10 Q. Did you report it to the Columbus Police</p> <p>11 Department?</p> <p>12 A. No, I did not. He worked for the</p> <p>13 Columbus Police Department.</p> <p>14 Q. You still didn't report it, did you?</p> <p>15 A. No, I didn't.</p> <p>16 Q. You indicated he was forging credit card</p> <p>17 slips. Did you report that to the Columbus</p> <p>18 Police Department?</p> <p>19 A. It was under investigation while I was</p> <p>20 there, so I reported it to Detective Rosser.</p> <p>21 Q. But that wasn't at the time that you</p> <p>22 found out about it?</p> <p>23 A. It was right about the same time.</p> <p>24 Q. Okay. So --</p>

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<p style="text-align: right;">Page 82</p> <p>1 A. It was a few days.</p> <p>2 Q. Okay. If you could let me finish my</p> <p>3 question --</p> <p>4 A. I'm sorry.</p> <p>5 Q. -- before answering, it would make it</p> <p>6 much cleaner for the court reporter. I'm sure</p> <p>7 she would really appreciate it.</p> <p>8 Did Mr. Sokol have access to the machine</p> <p>9 to run credit card slips?</p> <p>10 A. Yes.</p> <p>11 Q. What was his position at the time of the</p> <p>12 alleged forging of credit card slips?</p> <p>13 A. He was what they call a VIP host. He</p> <p>14 ran and oversaw the rooms in the champagne area,</p> <p>15 the VIP area, those rooms.</p> <p>16 Q. In that position, did he have, like, his</p> <p>17 own credit card machine back there?</p> <p>18 A. It was a mobile, personal, like a</p> <p>19 hand-held credit card machine, yes.</p> <p>20 Q. Did they have a credit card machine like</p> <p>21 that by wherever the private dancing booths</p> <p>22 were, too?</p> <p>23 A. No.</p> <p>24 Q. So if somebody wanted to pay for a</p>	<p style="text-align: right;">Page 84</p> <p>1 And Jeremy, from my understanding, even on TV,</p> <p>2 he even testified that he was working both</p> <p>3 sides. So we weren't aware of that. We thought</p> <p>4 he was an employee.</p> <p>5 Q. You indicated he made up false</p> <p>6 statements. Do you know these things to be</p> <p>7 false or do you believe them to be false?</p> <p>8 A. Anything that came out of his mouth was</p> <p>9 false. I guess I don't know how to answer your</p> <p>10 question. I didn't have a lot of conversations</p> <p>11 with Jeremy after-the-fact. I never saw him</p> <p>12 after that.</p> <p>13 Q. Okay.</p> <p>14 A. But while I was gone, I know that he was</p> <p>15 saying and doing things that weren't true, very</p> <p>16 disruptive. I don't care what these guys say</p> <p>17 about me, I know who I am. It didn't matter to</p> <p>18 me what he wanted to say. It's all bullshit --</p> <p>19 excuse me. So I think he was not a type of guy</p> <p>20 that was trustworthy by any means.</p> <p>21 Q. You don't like him, do you?</p> <p>22 A. Not at all.</p> <p>23 Q. When you observed him take a bet, you</p> <p>24 indicated that you just had a conversation with</p>
<p style="text-align: right;">Page 83</p> <p>1 private dance using a credit card, how would</p> <p>2 they go about doing that?</p> <p>3 A. They would have to buy -- they would</p> <p>4 have to go to the bar and buy what they call</p> <p>5 Kahoots cash.</p> <p>6 Q. Okay. Did they get paid -- did they get</p> <p>7 actual cash from the bartender, like say they</p> <p>8 put --</p> <p>9 A. No. Kahoots cash was not actual cash.</p> <p>10 It came in denominations of tens and 20s, and</p> <p>11 they would use that for tipping.</p> <p>12 Q. So kind of like Monopoly money, but for</p> <p>13 Kahoots?</p> <p>14 A. Yes.</p> <p>15 Q. Thank you.</p> <p>16 You called Sokol a rat. Can you explain</p> <p>17 why you called him that?</p> <p>18 A. Because he presented himself as an</p> <p>19 employee, but at the time when he came back in</p> <p>20 he made up false statements about people to come</p> <p>21 in. And I don't know what his association was</p> <p>22 with Detective Rosser but, you know, where I'm</p> <p>23 from, that's -- you're a rat. Like you come in</p> <p>24 and you want to work both sides of the fence.</p>	<p style="text-align: right;">Page 85</p> <p>1 him; is that correct?</p> <p>2 A. It was kind of a casual thing. I saw</p> <p>3 him talking to somebody about a football game</p> <p>4 and the guy was saying something about putting</p> <p>5 money on something, and I saw it. I went up and</p> <p>6 questioned, what are you doing? He said, I try</p> <p>7 to make a little bit of money on the side. I</p> <p>8 said, don't do that in here, and that was the</p> <p>9 end of the conversation. I said, if I see you</p> <p>10 do it again, you're going to be gone.</p> <p>11 He was known to be a gambler, was a big</p> <p>12 guy at the casino. He thought he was a big</p> <p>13 deal, you know, he would run around and thought</p> <p>14 he was a crazy guy, big money guy, you know, he</p> <p>15 had all these ins and outs. As I said earlier</p> <p>16 in my testimony, biggest mistake I made was</p> <p>17 bringing that guy into the nightclub.</p> <p>18 Q. Now we're going to talk a little bit</p> <p>19 about Rosser. Did you ever report Rosser to the</p> <p>20 Columbus Police Department, either to his</p> <p>21 supervisor or internal affairs?</p> <p>22 A. I believe Joe Sullo did. Internal</p> <p>23 affairs never contacted me.</p> <p>24 Q. So you never contacted internal affairs</p>

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<p style="text-align: right;">Page 86</p> <p>1 or Rosser's supervisor personally?</p> <p>2 A. I don't remember. I don't remember. I</p> <p>3 may have called and no one ever returned my</p> <p>4 call.</p> <p>5 Q. You indicated someone who worked with</p> <p>6 you was with Lancaster during what you called</p> <p>7 the NAG investigation. Do you recall that?</p> <p>8 A. Yes.</p> <p>9 Q. Do you remember who the assistant was</p> <p>10 that was with Lancaster?</p> <p>11 A. Yes.</p> <p>12 Q. Who was it?</p> <p>13 A. It was Travis Brett.</p> <p>14 Q. You were talking about a logbook in</p> <p>15 which you would take notes of any criminal</p> <p>16 activity that you observed. Do you recall that</p> <p>17 conversation with Chris?</p> <p>18 A. Yeah. It was a logbook that recorded</p> <p>19 many things. But if it was something that we</p> <p>20 saw, it would be recorded in that logbook.</p> <p>21 Q. You indicated that every time you saw</p> <p>22 criminal activity you put it in that logbook.</p> <p>23 A. I didn't see a lot of criminal activity.</p> <p>24 Q. Okay.</p>	<p style="text-align: right;">Page 88</p> <p>1 month, is your testimony that they never</p> <p>2 informed you of that?</p> <p>3 A. I wasn't aware of that.</p> <p>4 Q. Okay. And would you agree that as the</p> <p>5 general manager it is your responsibility to</p> <p>6 ensure that employees and patrons are following</p> <p>7 the law?</p> <p>8 A. It's my responsibility.</p> <p>9 Q. Would you agree that as a general</p> <p>10 manager it is your responsibility to ensure that</p> <p>11 the dancers are following the law?</p> <p>12 A. It's my responsibility.</p> <p>13 Q. You earlier also indicated that it's</p> <p>14 hard to catch all criminal acts; is that</p> <p>15 correct?</p> <p>16 A. It's hard to see everything, yeah. It's</p> <p>17 hard to see if somebody has a party on. You</p> <p>18 know, it's hard to see everything that's going</p> <p>19 on all the time.</p> <p>20 Q. I understand. Part of the allure of the</p> <p>21 private room is that you're kind of private, in</p> <p>22 that not everybody can see everything; is that</p> <p>23 correct?</p> <p>24 A. It's a private room, yeah.</p>
<p style="text-align: right;">Page 87</p> <p>1 A. I can't even say that I have anything in</p> <p>2 there other about the Jeremy Sokol thing, to be</p> <p>3 honest with you.</p> <p>4 Q. If someone else would testify that you</p> <p>5 would leave paper notes to communicate various</p> <p>6 criminal activities that happened, would that be</p> <p>7 a lie?</p> <p>8 A. That I would leave what, paper notes?</p> <p>9 Q. A note, like a piece of paper with a</p> <p>10 note on it, not necessarily in a logbook but a</p> <p>11 loose sheet of paper.</p> <p>12 A. I don't write notes. I don't write</p> <p>13 notes to leave them for anybody. I don't write</p> <p>14 notes, so I wouldn't do that.</p> <p>15 Q. Is it your testimony that no other</p> <p>16 manager told you when criminal activity was</p> <p>17 happening at the club?</p> <p>18 A. There wasn't any criminal activity that</p> <p>19 I was aware of and that I can remember, other</p> <p>20 than the citations that came out.</p> <p>21 Q. So if someone else testified that there</p> <p>22 was criminal activity to the point where they</p> <p>23 had to remove someone, an employee or a dancer,</p> <p>24 from the club at least a couple of times a</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. Do you know how often the booths were</p> <p>2 cleaned?</p> <p>3 A. We have a cleaning person come in every</p> <p>4 night.</p> <p>5 Q. Okay. Do you think they would clean out</p> <p>6 enough to get all the used condoms out of the</p> <p>7 private booths?</p> <p>8 A. I never found those in there.</p> <p>9 Q. If a cleaning crew member observed used</p> <p>10 condoms, would they be -- should they have</p> <p>11 reported that to you?</p> <p>12 A. Yes.</p> <p>13 Q. Did they ever report it to you?</p> <p>14 A. No, and neither did the security person</p> <p>15 who cleans the room themselves at the end of the</p> <p>16 night. They go in, take out empty glasses, make</p> <p>17 sure everything is out of there. If there was</p> <p>18 ever any knowledge of that, they would see that.</p> <p>19 Q. So if there were photos of a booth with</p> <p>20 used condoms in it, you don't know anything</p> <p>21 about that?</p> <p>22 A. I saw that photo.</p> <p>23 Q. Okay. Would you say -- I mean, it was a</p> <p>24 used -- there were used condoms in those photos.</p>

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<p style="text-align: right;">Page 90</p> <p>1 Correct?</p> <p>2 A. One photo.</p> <p>3 Q. Okay. So you saw one photo with a used</p> <p>4 condom in it?</p> <p>5 A. From what I understand, and I don't do</p> <p>6 Facebook, but it was posted on somebody's</p> <p>7 Facebook. It was never brought to me, and it</p> <p>8 was after I had left the club.</p> <p>9 If you want my honest opinion, I think</p> <p>10 something like that, it was a dance booth, it</p> <p>11 wasn't a private area, I think that's a very,</p> <p>12 very difficult thing to do. It was quite a pile</p> <p>13 of them. To me it looked almost like a staged</p> <p>14 situation. Where they were, you would have to</p> <p>15 pull the bench out, which is a very difficult</p> <p>16 thing to do, they're nailed in. You would have</p> <p>17 to take the bench and pull it out. They were</p> <p>18 thrown behind the bench, if that's the same</p> <p>19 photo we're talking about.</p> <p>20 I haven't seen the photo that you're</p> <p>21 talking about. Where it was, it wasn't under a</p> <p>22 couch or chair, it was behind a solid dance</p> <p>23 booth behind a wall, and the whole booth would</p> <p>24 have to be pulled out. I question it. I didn't</p>	<p style="text-align: right;">Page 92</p> <p>1 2012, something like that.</p> <p>2 Q. Did you ever live together?</p> <p>3 A. Yes.</p> <p>4 Q. When did you stop living together?</p> <p>5 A. She still has a room and keeps her stuff</p> <p>6 at my place. I would say I moved out to Arizona</p> <p>7 for a while for a job out there and she stayed</p> <p>8 here. Her mom came here eventually, and I ended</p> <p>9 up sponsoring her mom so she could get a green</p> <p>10 card, be with her mom. We're kind of like</p> <p>11 family.</p> <p>12 Q. What country is she from?</p> <p>13 A. She's from Russia.</p> <p>14 Q. Did you ever consummate the marriage?</p> <p>15 A. No.</p> <p>16 Q. When did she get her green card?</p> <p>17 A. Three years after she was here, I</p> <p>18 believe. She had a green card -- I forget the</p> <p>19 system. She became a citizen, she had the green</p> <p>20 card, we went through the citizenship process</p> <p>21 and all that stuff.</p> <p>22 Q. Do you remember when she became a</p> <p>23 citizen?</p> <p>24 A. Three years from the date that I met</p>
<p style="text-align: right;">Page 91</p> <p>1 see any of that going on. We didn't sell</p> <p>2 condoms in the nightclub. We didn't allow any</p> <p>3 of that.</p> <p>4 Q. You indicated that there was a bathroom</p> <p>5 attendant.</p> <p>6 A. Yes.</p> <p>7 Q. The bathroom attendant, was he an</p> <p>8 employee?</p> <p>9 A. No.</p> <p>10 Q. Was he an independent contractor?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Did you ever ensure that he was</p> <p>13 not selling condoms?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. I believe earlier you stated that</p> <p>16 you were still married to Alisa.</p> <p>17 A. We don't live together any longer.</p> <p>18 We're still married, but she's kind of moved on</p> <p>19 and has her own life. But we're still friends,</p> <p>20 good friends.</p> <p>21 Q. When did you get married?</p> <p>22 A. September of, I believe it was -- we got</p> <p>23 married at city hall. So it was September</p> <p>24 29th -- we've been married nine years -- 2011,</p>	<p style="text-align: right;">Page 93</p> <p>1 her. We were pretty much on track with the</p> <p>2 system.</p> <p>3 Q. I'm not sure when you met her.</p> <p>4 A. We had an attorney, we had an</p> <p>5 immigration attorney and so forth. It was a</p> <p>6 very proud day. I was very proud of her, that</p> <p>7 she became a citizen. I don't want it to be</p> <p>8 misinterpreted. She's a good person. She came</p> <p>9 into my life, and sometimes people are put into</p> <p>10 your life and you just realize they're there for</p> <p>11 a reason. I wanted to do something nice for</p> <p>12 somebody.</p> <p>13 She just struck me as being a nice, nice</p> <p>14 person and, you know, she was a dancer, she</p> <p>15 danced for a little bit. But she was</p> <p>16 struggling, you know, and she loves this country</p> <p>17 and wanted to get her mom here. She had no dad.</p> <p>18 So I said, look, I don't want to be married,</p> <p>19 either, but it would be great, I have a big</p> <p>20 place. She has her own room, her own stuff, she</p> <p>21 dated guys.</p> <p>22 You know, and I didn't marry her just</p> <p>23 to -- I told her I wouldn't do it if I didn't</p> <p>24 love her or care about her. I didn't have a</p>

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<p style="text-align: right;">Page 94</p> <p>1 daughter. We had a very unique relationship 2 that I don't expect many people to understand, 3 but she means a lot to me. 4 Q. How old is she? 5 A. She's 30 now. 6 Q. Did you charge her or her mother to 7 sponsor them? 8 A. No. I paid for everything. 9 MS. NOBLE: One moment, please. 10 (Pause in proceedings.) 11 THE WITNESS: When you're ready, let me 12 know. 13 MS. NOBLE: I'm ready. 14 THE WITNESS: The other day -- not that 15 this has anything to do with anything, but I 16 kind of want to show you a little something. 17 The other day, one of the house moms 18 that used to work with me, we keep in touch, 19 she's remarried, has a couple kids, and they're 20 Buckeye fans all that stuff. We keep in touch. 21 I recently just had an operation, and she's an 22 RN. So she would check on me because I live 23 alone and she said, how you doing and stuff. 24 And I said, good. She said, I didn't want to</p>	<p style="text-align: right;">Page 96</p> <p>1 about that. The other day she got her passport, 2 she went out and voted, even though we're on 3 different sides of the political spectrum, but 4 she voted, and she loves this country. She's a 5 very good person to me. She cares about me. 6 She looks after me. And for someone like that 7 to be disrespectful or throw me into, you know, 8 some sort of, you know, stereotype of 9 individual, that's not me. 10 I've done this business, because that's 11 where I feel I should be. And like I said, I 12 have done lots of things for lots of people. A 13 lot of these girls, I've seen them go through 14 college and get married, have kids. I have 15 stuff on my phone, they're sending me pictures 16 of their kids and their husband, they're happy 17 to have had the experience. I ran a good 18 nightclub. 19 So was there criminal activity? I'm 20 sure somebody didn't have a party on from time 21 to time. Over the years I was there, you try to 22 screen out the best that you can do, and I was 23 on point with that. I watched everything that 24 went on in that nightclub. I didn't allow just</p>
<p style="text-align: right;">Page 95</p> <p>1 tell you this, but before you had your operation 2 Jeremy Sokol hit her up on Instagram and said, 3 hey, I hear Joe Vaillancourt died from COVID. 4 If his wife is looking for a shoulder to cry on, 5 let her know I'm available. It's a pretty sick 6 thing, and that just happened the other day. 7 So I'm hearing a lot about this guy, and 8 I don't like it. I'm a 70-year-old man. For 9 him to make comments like that and be 10 disrespectful to, not only me, but to Alisa, and 11 contacting people that used to work for me, I 12 think, just kind of says the type of character 13 that this guy is. So, you know, that's that. 14 Probably the best thing that I did out of all 15 this time at Kahoots, and as I said, I have 16 known many, many people, I have done a lot of 17 things for a lot of people, I'm not going to 18 toss out names, I know what I have done. 19 I don't care about Rosser. I don't care 20 about Lancaster. They'll get what's due them. 21 But one of the nicest things I probably did in 22 my entire life was to help this girl become a 23 citizen and bring her mom here. When I'm on my 24 way out I can look back and say, I feel good</p>	<p style="text-align: right;">Page 97</p> <p>1 anything to go on. 2 MS. NOBLE: I appreciate you stating all 3 of that. 4 I have no further questions. I'm sure 5 that the plaintiffs' attorney has some questions 6 for you. 7 MR. GOLDSTEIN: Yes, I do, Andria. 8 Thank you. 9 EXAMINATION 10 BY MR. GOLDSTEIN: 11 Q. This is David Goldstein and Bart Keyes. 12 We represent the plaintiffs, and we're in a 13 conference room just a little bit over. I have 14 a couple questions. I want to try and be brief 15 so we can get you out of here. Okay? 16 A. Yep. 17 Q. Bart is going to turn the video so you 18 can see my ugly mug. 19 A. There you go. 20 Q. It's not a pretty sight. I want to 21 clear up some things you said during your 22 direct -- not direct, during some of the 23 questioning. I think there's some dates. 24 You talked about that you left Kahoots</p>

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<p style="text-align: right;">Page 98</p> <p>1 or were terminated November 19th, 2018. If the 2 records show that it was 2017, would you have 3 any reason to dispute that? 4 A. No. It all kind of mumbles, jumbles, 5 I'm losing it. 6 Q. In regard to terminating Jeremy Sokol 7 you indicated you were the individual that did 8 that. Correct? 9 A. Yes. 10 Q. You mentioned you thought it was in 11 September or October of 2018. Again, if the 12 records show that would have been 2017 -- 13 A. Yeah. I go with that. I had the wrong 14 year, I guess. 15 Q. Okay. 16 A. I kind of get confused with when he was 17 fired and then they brought him back. 18 Q. Okay. I understand that but when they 19 brought Jeremy Sokol back, you were no longer 20 working at Kahoots. Correct? 21 A. No. 22 Q. I'm correct in that statement? 23 A. I'm sorry. Yes, you're correct. 24 Q. You talked about the day that, I believe</p>	<p style="text-align: right;">Page 100</p> <p>1 received a citation that you talked about 2 earlier. Do you remember that? 3 A. Yes. 4 Q. On the citation, there were some 5 questions, Chris asked the date of that 6 citation -- the date of the offense was October 7 28th, 2017. Okay? 8 A. Yes. 9 Q. My question to you, then, is, do you 10 remember, was that NAG inspection before the 11 date of that offense or after the date of that 12 offense, if you know? 13 A. I would have to say it was -- the NAG 14 investigation was before. 15 Q. So you got -- based upon your testimony, 16 you received this citation after you had already 17 fired Jeremy Sokol. Correct? 18 A. Yes. 19 Q. And after you had advised Detective 20 Rosser that you fired Jeremy Sokol? 21 A. Yes. 22 Q. I want to ask, besides receiving this 23 citation, have you ever been charged with any 24 other violations in, basically, the adult</p>
<p style="text-align: right;">Page 99</p> <p>1 it was the NAG inspection, and you spoke with 2 Detective Rosser. Correct? 3 A. Correct. 4 Q. Obviously, at that point in time, you 5 were still working at Kahoots. Correct? 6 A. Yes. 7 Q. At that point in time, you had already 8 fired Jeremy Sokol. Correct? 9 A. Yes. 10 Q. That's when you gave Detective Rosser 11 the handwritten note that I believe -- 12 A. Yes. 13 Q. Let me just finish my question. 14 A. Oh. 15 Q. I believe that's when you gave Detective 16 Rosser a handwritten note marked as Defendant's 17 5 under tab 5; is that correct? 18 A. Yeah. 19 Q. Do you remember when that NAG 20 inspection, I'll call it, occurred? 21 A. I remember everything very vividly about 22 it except the date. 23 Q. Okay. Let me ask you a question. You 24 received -- we talked about it a little bit, you</p>	<p style="text-align: right;">Page 101</p> <p>1 entertainment field? 2 A. No. 3 Q. I didn't hear the question, so I'll ask, 4 have you ever been convicted of, pled guilty to 5 or entered a no-contest plea to a felony? 6 A. No. 7 Q. Have you ever been charged with a 8 felony? 9 A. No. 10 Q. Have you ever pled guilty to, entered a 11 no-contest plea or been convicted of a 12 misdemeanor, other than simple traffic offenses, 13 and other than the one that Detective Rosser 14 charged against you that was ultimately 15 dismissed? 16 A. No. 17 Q. So this is the first time you have ever 18 been charged with a crime, when Detective Rosser 19 did this to you, other than a speeding ticket? 20 A. There were two other times when I first 21 moved here when Senate Bill 16 first went into 22 effect, they charged me with this Senate Bill 23 16, but then they dismissed it. 24 Q. Okay. When you say when you "first</p>

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<p style="text-align: right;">Page 102</p> <p>1 moved here," what year was that?</p> <p>2 A. Whenever Senate Bill 16 went into</p> <p>3 effect, the first year, I think it was 2008</p> <p>4 maybe, when it went into effect.</p> <p>5 Q. So from 2008 until 2017, you have never</p> <p>6 been charged with anything related in the adult</p> <p>7 entertainment business until Rosser charged you;</p> <p>8 is that correct?</p> <p>9 A. Correct.</p> <p>10 Q. Just to clear something up, did you</p> <p>11 receive that charge -- did Rosser hand it to</p> <p>12 you, or did you get it in the mail?</p> <p>13 A. I got it in the mail.</p> <p>14 Q. Was that already after you had been</p> <p>15 terminated or before?</p> <p>16 A. From what I understand --</p> <p>17 Q. I'm just asking what you know. Tell me</p> <p>18 what you remember.</p> <p>19 A. It was after, I believe, or within a</p> <p>20 couple days after. I already knew I was being</p> <p>21 let go.</p> <p>22 Q. Okay. You talked a little bit about</p> <p>23 being terminated, then you said you were let go,</p> <p>24 it was an agreement. You said you were able to</p>	<p style="text-align: right;">Page 104</p> <p>1 A. The definition of criminal activity is</p> <p>2 what?</p> <p>3 Q. Sure. Have you sold any drugs?</p> <p>4 A. No.</p> <p>5 Q. Have you encouraged anyone to sell any</p> <p>6 drugs?</p> <p>7 A. No.</p> <p>8 Q. Have you known about people selling</p> <p>9 drugs in the club and just basically turned a</p> <p>10 blind eye to that?</p> <p>11 A. Never.</p> <p>12 Q. The same questions with prostitution,</p> <p>13 anything that you have either been involved in</p> <p>14 prostitution at the club or knew prostitution</p> <p>15 was going on at the club and turned a blind eye</p> <p>16 to that?</p> <p>17 A. Never.</p> <p>18 Q. Did you ever receive any warning from</p> <p>19 any Columbus police officer prior to receiving</p> <p>20 the citation from Detective Rosser that you</p> <p>21 needed to clean up your behavior as it related</p> <p>22 to your employment with the club?</p> <p>23 A. Never. Can I make a statement?</p> <p>24 Q. Hold on. Let me just ask the questions</p>
<p style="text-align: right;">Page 103</p> <p>1 collect, you were able to collect unemployment.</p> <p>2 Correct?</p> <p>3 A. Correct.</p> <p>4 Q. Kahoots or Icon Entertainment didn't</p> <p>5 dispute the unemployment that you were</p> <p>6 collecting. Correct?</p> <p>7 A. They did not.</p> <p>8 Q. And Joe Sullo told you the only reason</p> <p>9 he was firing you was because of Detective</p> <p>10 Rosser's statements to him; is that correct?</p> <p>11 A. Correct.</p> <p>12 Q. The note that we talked about, which is,</p> <p>13 again, for the record, Exhibit 5, the one you</p> <p>14 gave to Rosser, did he take that note with him?</p> <p>15 A. Yes.</p> <p>16 Q. We have had a lot of documents in this</p> <p>17 case, and I'm going to ask you some questions.</p> <p>18 Detective Rosser has made representations in</p> <p>19 some of the documents that we have seen that you</p> <p>20 may have engaged in criminal activity at the</p> <p>21 club.</p> <p>22 Have you ever engaged in any type of</p> <p>23 criminal activity while an employee of Kahoots</p> <p>24 or Icon Entertainment?</p>	<p style="text-align: right;">Page 105</p> <p>1 so we can move some things along. I</p> <p>2 understand -- we're trying to get facts about</p> <p>3 this case, I understand you want to talk about</p> <p>4 your personal thing.</p> <p>5 A. Just a definition.</p> <p>6 Q. In regard to your dismissal, did you</p> <p>7 file any type of federal lawsuit?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Who did you file that against?</p> <p>10 A. The City and Detectives Rosser and</p> <p>11 Lancaster.</p> <p>12 Q. Is that a result of you believe that</p> <p>13 they forced you out of the business?</p> <p>14 A. Yes.</p> <p>15 Q. Did you settle that case?</p> <p>16 A. Yes.</p> <p>17 Q. Do you know how much you settled that</p> <p>18 for?</p> <p>19 A. Do I have to discuss that? I'm not sure</p> <p>20 if I can legally discuss that.</p> <p>21 Q. It's not confidential. I can tell you</p> <p>22 that, because the City has to get it approved by</p> <p>23 city council. So it's made public.</p> <p>24 A. \$20,000.</p>

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<p style="text-align: right;">Page 106</p> <p>1 Q. Did you give an interview to the FBI?</p> <p>2 A. Yes.</p> <p>3 Q. Do you have any recordings of any</p> <p>4 conversations that you had with Jeremy Sokol at</p> <p>5 any time?</p> <p>6 A. No.</p> <p>7 Q. Do you have any recordings that you made</p> <p>8 of the one time that you spoke with Detective</p> <p>9 Rosser?</p> <p>10 A. No.</p> <p>11 Q. Do you know Chris Jobin?</p> <p>12 A. Yes.</p> <p>13 Q. How do you know Chris?</p> <p>14 A. He worked for me.</p> <p>15 Q. What would you consider of his work --</p> <p>16 strike that.</p> <p>17 How would you characterize his work for</p> <p>18 you when he was employed at Icon?</p> <p>19 A. Mediocre.</p> <p>20 Q. Did you terminate him?</p> <p>21 A. It was a mutual agreement. Yes.</p> <p>22 Q. What was the basis of your termination</p> <p>23 of him?</p> <p>24 A. He just was -- I think it was just time</p>	<p style="text-align: right;">Page 108</p> <p>1 EXAMINATION</p> <p>2 BY MR. GREEN:</p> <p>3 Q. Did you ever have any conversations with</p> <p>4 Joe Sullo about Rosser and/or Lancaster?</p> <p>5 A. Yes.</p> <p>6 Q. What were those conversations?</p> <p>7 A. Pretty much that Joe was not</p> <p>8 understanding why Rosser was doing what he was</p> <p>9 doing and that he felt threatened by Detective</p> <p>10 Rosser.</p> <p>11 Q. And those were conversations that you</p> <p>12 had directly with Mr. Sullo?</p> <p>13 A. Yes.</p> <p>14 Q. Were those in person or over the</p> <p>15 telephone?</p> <p>16 A. Pretty much over the phone.</p> <p>17 Q. Do you know about how many times you</p> <p>18 talked to Mr. Sullo about Mr. Rosser?</p> <p>19 A. I had one other conversation with Joe.</p> <p>20 So maybe, I don't know, maybe three, four times,</p> <p>21 maybe, around there, not many.</p> <p>22 Q. Was the nature of those conversations</p> <p>23 the same as you just described?</p> <p>24 A. Sometimes he was just checking on me to</p>
<p style="text-align: right;">Page 107</p> <p>1 for him to move on. I wasn't happy with his</p> <p>2 work, and he wasn't happy, probably, in what he</p> <p>3 was doing, so it was time for him to move on.</p> <p>4 Q. Did Detective Rosser or anyone at CPD</p> <p>5 ask you to give written statements about when</p> <p>6 they came in and did the NAG investigation, did</p> <p>7 they ever ask you to write anything about your</p> <p>8 observations of the club or any wrongdoing going</p> <p>9 on in the club?</p> <p>10 A. No.</p> <p>11 Q. Did they ever interview you?</p> <p>12 A. They just asked me for my ID.</p> <p>13 Q. So they didn't even ask you questions?</p> <p>14 A. No.</p> <p>15 MR. GOLDSTEIN: Just give me one moment.</p> <p>16 (Pause in proceedings.)</p> <p>17 MR. GOLDSTEIN: Sir, I don't have any</p> <p>18 additional questions. Chris or Andria may have</p> <p>19 follow-up questions, but thank you.</p> <p>20 THE WITNESS: Yep.</p> <p>21 MR. GREEN: Mr. Vaillancourt, this is</p> <p>22 Chris Green again. I just have a couple</p> <p>23 follow-up questions for you, and that may be</p> <p>24 just one.</p>	<p style="text-align: right;">Page 109</p> <p>1 see how I was doing and how I was getting along.</p> <p>2 He was trying to, you know, see what he could do</p> <p>3 to clear up this mess and move forward. We had</p> <p>4 talked about, you know, helping the girls out,</p> <p>5 defending some of the girls that got these</p> <p>6 citations, you know. He wanted to help them out</p> <p>7 and get legal representation for them. They</p> <p>8 were nervous and afraid about stuff.</p> <p>9 And we did have a conversation about --</p> <p>10 and one of the things I wanted to say to</p> <p>11 Mr. Goldstein, as well, was the definition of</p> <p>12 criminality. This was being used to Mr. Sullo</p> <p>13 in the beginning that I was allowing criminal</p> <p>14 activity. Well, the definition of the criminal</p> <p>15 activity was allowing someone to dance without a</p> <p>16 pasty, not that I was allowing prostitution or</p> <p>17 drugs. There was never any of that found at</p> <p>18 all. The club had been investigated several</p> <p>19 times over the years, and they never found any</p> <p>20 of that.</p> <p>21 Joe was concerned about that. I said</p> <p>22 that there wasn't anything going on. And he</p> <p>23 said at that point that Joe was confident that</p> <p>24 the club was being run properly, that</p>

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<p style="text-align: right;">Page 110</p> <p>1 Mr. Rosser -- and this is what Joe told me -- 2 said that he was going to cite me for criminal 3 activity, give me a citation, and that I would 4 not be able to work in his nightclub or anywhere 5 in the city. Joe Sullo called me and told me 6 what was going to happen and said, this guy 7 basically black-balled you from ever working 8 again. 9 As far as I know, I said to Joe, I don't 10 know of anything, I haven't gone to court yet, I 11 haven't gotten the citation. When I got the 12 citation, it was based on a dancer that Rosser 13 did a private dance with and supposedly took her 14 pasties off. I don't know that for a fact. No 15 one reported it to me. That's what was said. 16 That was the citation, that was my 17 criminality. The point I wanted to make is, my 18 criminal activity was allowing a girl to dance 19 without a pasty on, and I didn't see it 20 happening. That was the citation that put me 21 out of business. I guess the other girls, as 22 well, who got citations, they were -- 23 supposedly, Rosser was not going to allow them 24 to work in any other nightclub. So he was</p>	<p style="text-align: right;">Page 112</p> <p>1 BY MR. GREEN: 2 Q. So you would agree it was taking place 3 but you just didn't see it. Correct? 4 A. The only ones -- the only person that 5 ever cited any of the dancers was Detective 6 Rosser. So I question whether or not -- really, 7 what was going on. 8 Q. So OIU was never at the club citing 9 dancers? 10 A. Not on my shift, that I know of. 11 Q. Is there -- 12 A. That rule is not Senate Bill 16, either. 13 That's a liquor law. So it's a different 14 interpretation. 15 Q. Is there anything else that we haven't 16 talked about today that you think we should hear 17 about or know about? 18 A. What was the relationship between 19 Detective Rosser and Jeremy Sokol? 20 Q. Are you asking me or is that -- 21 A. Yeah, I'm asking you. 22 Q. I can't answer that, I'm sorry. 23 A. I think the credibility about me is 24 questioning those types of individuals that, you</p>
<p style="text-align: right;">Page 111</p> <p>1 creating some laws here that really weren't on 2 the books. 3 That was something that Joe and I talked 4 about, that, you know, he wanted to get me back 5 running the nightclub, back at the nightclub. 6 He wanted to make sure this guy was being found 7 out as to what he was doing was improper. 8 Q. I think you testified that there was 9 very little or no criminal activity occurring at 10 the nightclub. Was that your testimony today? 11 A. Yes. 12 Q. Are you aware that dancing without a 13 pasty or touching a patron when the dancer is in 14 a state of nudity or partial nudity is 15 considered a crime? 16 A. Yes. 17 MR. GOLDSTEIN: Object as to form. 18 BY MR. GREEN: 19 Q. So you would agree there was criminal 20 activity occurring at the nightclub. Correct? 21 MR. GOLDSTEIN: Objection as to form. 22 A. If I saw it, I would respond to it. But 23 if that took place, then I would have to say, 24 yes. These were citations.</p>	<p style="text-align: right;">Page 113</p> <p>1 know, obviously are under investigation. As far 2 as I know, when I was defending myself, I saw 3 discovery from my attorney that showed that the 4 club had come in and that the complaints on the 5 club were towards Jeremy Sokol made by a dancer. 6 When they came into the club on two 7 separate occasions, they didn't find any 8 criminal activity happening at all. That's part 9 of -- that's part of discovery on this 10 investigation by other vice officers that came 11 in. They didn't find anything, and they came in 12 on two, three separate occasions undercover and 13 found everything -- and found nothing. 14 The night that Malaysia was cited, 15 Jeremy Sokol was working that night, and he set 16 that up. He set that girl up. When that girl 17 came to me, okay, and she said, yeah, she said 18 some things that she probably shouldn't have 19 said, but she also said that one of the officers 20 kept on trying to grab her vagina in the private 21 dance and put his hands all over her, and she 22 was afraid and she was threatened. I said, 23 well, you can tell that in court, but she was 24 afraid.</p>

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<p style="text-align: right;">Page 114</p> <p>1 I remember the two officers that came in 2 that night. One was a liquor guy, one was a 3 vice guy, one guy was sopping wet he was 4 sweating so much, he was so nervous. And the 5 girl, Malaysia, was scared to death. And she 6 admitted she said things she probably shouldn't 7 have said. But they were just words, and she 8 was trying to make a buck and it was wrong. But 9 that guy putting his hands on her and tried to 10 grab her vagina. She wasn't lying to me, she 11 had no reason to say that. 12 Q. Did you report that to anyone? 13 A. I'm sorry? 14 Q. Did you report that to anyone? 15 A. No, because I never saw her again after 16 that, and I didn't know what to do. 17 Q. So after you had a dancer come report to 18 you that a patron tried to grab her -- 19 A. The officer. 20 Q. The officer. Did you know he was an 21 officer at that point in time? 22 A. I didn't know who it was. 23 Q. So at that time you knew it was a patron 24 had tried to grab a dancer and touch her vagina,</p>	<p style="text-align: right;">Page 116</p> <p>1 sitting with a citation. 2 That was the only time I was given a 3 citation inside that nightclub by the officers 4 that gave the citation that night, in front of 5 me and the dancer, in all my years there. I 6 didn't find out about Jeremy Sokol being 7 involved with that until afterwards. But 8 obviously he was being investigated, which I 9 knew he was being investigated by Detective 10 Rosser. So I guess he had to kind of save his 11 own skin. 12 We never saw any discovery from 13 Detective Rosser on the investigation into 14 Jeremy Sokol, which Jeremy, from what I 15 understood, had at least three or four -- and 16 it's part of discovery -- complaints lodged 17 against him for prostitution. Where's that 18 investigation? I don't know. But it took place 19 at the nightclub, we never found it, it never 20 showed in any of the discovery, where the other 21 investigation by the other vice officers showed 22 no criminal activity happening at the nightclub. 23 That's all I wanted to say. 24 MR. JAMES: Thank you, sir. I don't</p>
<p style="text-align: right;">Page 115</p> <p>1 as you said, and you did not feel the need to 2 report that to the police? 3 A. It was the police. It was the police 4 officer that was touching her. So who am I 5 going to call? I didn't know if it was -- I 6 didn't know, I wasn't there, I didn't see it. 7 This is what she told me. The point being is 8 that under that citation there was more 9 involved. Okay? And I know for a fact that 10 Jeremy Sokol was working with undercover people 11 to put somebody there and to set that girl up. 12 She was -- you know, she probably wasn't the 13 most brightest girl on the dance floor. I kind 14 of gave her a break that night. She needed some 15 money, and I let her work. 16 It was a mistake on my part, because she 17 was probably one of the more vulnerable ones, 18 and Jeremy knew it. It was just something that 19 I'm responsible for, and the girl said some 20 things that was wrong, so that was that. That's 21 just my statement. There's a lot of things 22 going on here that sometimes people don't know. 23 But I didn't know who to report it to and I 24 didn't know how accurate it was, and there I am</p>	<p style="text-align: right;">Page 117</p> <p>1 have any further questions. Andria, if you have 2 anything else, the floor is yours. 3 MS. NOBLE: Thank you. Joe, I just have 4 a couple follow-up questions. 5 EXAMINATION 6 BY MS. NOBLE: 7 Q. You indicated that Malaysia admitted to 8 you that she said some things that she shouldn't 9 have. What exactly was she admitting to? 10 A. A conversation that she would do a 11 little bit extra for extra money. And I 12 guess -- and it was kind of a bizarre thing. I 13 think it's in the statement. The officer said, 14 what do you mean and she said, you know, I can 15 milk you like a goat. How bizarre is that, I 16 don't know what that means, milking you like a 17 goat. I think she was trying to say something 18 to get some extra money. But she never milked 19 anybody. She was trying to milk the guy for 20 some money, but she didn't milk him for -- she 21 didn't touch him. 22 Q. She didn't touch the officer; is that 23 correct? 24 A. Correct.</p>

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<p style="text-align: right;">Page 118</p> <p>1 Q. You don't know whether or not this 2 conversation happened at any other point in 3 time, do you?</p> <p>4 A. No. I believe it was just in that one 5 dance, I guess, I don't know.</p> <p>6 Q. You don't know whether or not it 7 happened, because you were not with her for her 8 private dances; is that correct?</p> <p>9 A. Correct.</p> <p>10 Q. Do you know anything about a 11 potential -- or Joe Sokol alleging he was going 12 to file a lawsuit against Kahoots?</p> <p>13 A. Jeremy Sokol.</p> <p>14 Q. I'm sorry, Jeremy Sokol. There's a lot 15 of J's.</p> <p>16 A. I don't pay attention to that guy. He's 17 a clown. For what?</p> <p>18 Q. I didn't know if this was happening 19 prior to your termination, if you had heard 20 about it.</p> <p>21 A. No.</p> <p>22 Q. You did not file a lawsuit against the 23 City of Columbus and Rosser and Lancaster; is 24 that correct?</p>	<p style="text-align: right;">Page 120</p> <p>1 can share my screen. Sorry, everybody, we just 2 found this. Am I able to share my screen? 3 Who's the host?</p> <p>4 MR. GREEN: Yeah, you should. Go ahead 5 and try, see if it works. It still says 6 disabled.</p> <p>7 MR. KEYES: Andria, it's Bart. Do you 8 want to e-mail and Chris can print a copy?</p> <p>9 MS. NOBLE: I'll just see if he can 10 remember, and I will also e-mail it.</p> <p>11 BY MS. NOBLE:</p> <p>12 Q. Joe, do you recall the language of your 13 settlement, including a part that said that 14 there was no admission of liability on the part 15 of Steven Rosser, the City of Columbus or any 16 police officer?</p> <p>17 A. I don't remember that.</p> <p>18 Q. Okay.</p> <p>19 A. What does that mean?</p> <p>20 Q. That means that they were not admitting 21 fault and they were paying you because it would 22 be -- because they felt it was just -- I was not 23 the lawyer on it. So it states that there's no 24 admission of liability, Vaillancourt understands</p>
<p style="text-align: right;">Page 119</p> <p>1 A. Say that again.</p> <p>2 Q. You did not actually file a lawsuit, you 3 filed a claim against the City of Columbus?</p> <p>4 A. I filed a lawsuit.</p> <p>5 Q. You went to court and filed a lawsuit, 6 or did you file a claim with the City of 7 Columbus?</p> <p>8 A. I had attorneys that filed a lawsuit. I 9 had Marshall and Foreman representing me, and 10 they filed a complaint, I guess, or a lawsuit, 11 whatever, but it was settled before we went to 12 court. I may be ignorant on the definition 13 but --</p> <p>14 Q. I'm going to correct you on the 15 termination.</p> <p>16 A. Okay.</p> <p>17 Q. You filed a claim, you did not file a 18 lawsuit, there was never a lawsuit filed with 19 the court.</p> <p>20 A. Okay.</p> <p>21 Q. You settled before a lawsuit occurred.</p> <p>22 A. Correct. We settled before we went to 23 court.</p> <p>24 Q. Hold on, let me -- I'm going to see if I</p>	<p style="text-align: right;">Page 121</p> <p>1 and agrees that this settlement is a compromise 2 of a disputed claim and that the City of 3 Columbus's payment is not to be construed as an 4 admission of liability on the part of Steven 5 Rosser, the City of Columbus, any police 6 officers involved in any situation involving 7 Vaillancourt or any other employee, agent or 8 official of the City of Columbus, by whom 9 liability is expressly denied.</p> <p>10 A. Okay.</p> <p>11 Q. Do you recall that being a part of 12 your --</p> <p>13 A. If that was there, I'm sure, yes. It's 14 been a while, but I read through it and I 15 understand. I also needed the money, and I was 16 out of work for a while, so I didn't have much 17 choice. But that's fine.</p> <p>18 Q. What I'm mostly asking is, there was no 19 admission of liability, there was no 20 determination of liability?</p> <p>21 A. There was no determination, correct.</p> <p>22 Q. And the City and Rosser specifically 23 denied liability?</p> <p>24 A. I guess so. Yes.</p>

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1 MS. NOBLE: Okay. No other questions at
2 this time. But I will send this to everybody so
3 everyone can have a copy of it.

4 MR. GOLDSTEIN: No questions from the
5 plaintiffs. Thank you.

6 MR. GREEN: We have no further
7 questions. I think you're good to go,
8 Mr. Vaillancourt. You have the -- if anyone
9 orders this, you have the opportunity to read
10 your deposition, you can't change anything that
11 you have testified to, but you can look at it
12 and make notes on spelling and whatnot, or you
13 can waive that opportunity.

14 THE WITNESS: Yeah, just let it go.

15 ==O==

16 Thereupon, the testimony of November
17 13, 2020, was concluded at 5:15 p.m.

18 ==O==

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21
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23
24

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1 CERTIFICATE

2 STATE OF OHIO :

SS:

3 COUNTY OF FRANKLIN :

4 I, Carmen G. Maley, a stenographic
5 court reporter and notary public in and for the
6 State of Ohio, duly commissioned and qualified,
7 do hereby certify that the within-named JOSEPH
8 VAILLANCOURT was first duly sworn to testify to
9 the truth, the whole truth, and nothing but the
10 truth in the cause aforesaid; that the testimony
11 then given was taken down by me stenographically
12 in the presence of said witness, afterwards
13 transcribed; that the foregoing is a true and
14 correct transcript of the testimony; that this
15 deposition was taken at the time and place in
16 the foregoing caption specified.

17 I certify that I am not a relative or
18 employee of any attorney or counsel employed by
19 the parties hereto and that I am not financially
20 interested in the action. I further certify
21 review of the transcript was waived.

22 In witness whereof, I have hereunto
23 set my hand at Columbus, Ohio, on this 1st day
24 of March, 2021.

Carmen G. Maley

Carmen G. Maley

Notary Public, State of Ohio

My commission expires: August 24, 2024

24

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Exhibits	1971 8:8	5	act 23:14 32:3 66:11
Exhibit 1 5:10 15:13	19th 9:18,20 39:20,23 50:15 98:1	5 15:15 99:17 103:13	acted 34:11
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